BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA COLUMBIA, SOUTH CAROLINA

HEARING #11-11248

DECEMBER 1, 2011 10:30 A.M.

ALLOWABLE EX PARTE BRIEFING

REQUESTED BY PROGRESS ENERGY CAROLINAS - 2011 Integrated Resource Plan

TRANSCRIPT OF PROCFEDINGS

COMMISSIONERS PRESENT: John E. 'Butch' HOWARD, CHAIRMAN, David A. Wright, Vice Chairman; and COMMISSIONERS Elizabeth B. 'Lib' FLEMING, G. O'Neal HAMILTON, Randy MITCHELL, Swain E. WHITFIELD, and Nikiya 'Nikki' HALL

ADVISOR TO COMMISSION: Joseph Melchers, Esq.

STAFF: F. David Butler, Senior Counsel; James Spearman, Ph.D., Executive Assistant to the Commissioners; B. Randall Dong, Esq., Legal Staff: Phil Riley and Tom Ellison, Advisory Staff: Jo Elizabeth M. Wheat, CVR-CM-GNSC, Court Reporter; and Dale Davis, Hearing Room Assistant

APPEARANCES:

LEN S. ANTHONY, ESQUIRE, along with GLEN SNIDER [MANAGER, RESOURCE PLANNING-TRANSMISSION OPERATIONS PLANNING] and CHRIS EDGE [DIRECTOR, RETAIL STRATEGY and EMERGING TECHNOLOGIES], presenters, representing PROGRESS ENERGY CAROLINAS, INC.

JEFFREY M. NELSON, ESQUIRE, representing the Office Of REGULATORY STAFF

Public Service Commission of South Carolina

101 Executive Center Drive COLUMBIA, SC 29210

Post Office Box 11649 COLUMBIA, SC 29211

WWW.PSC.SC.GOV

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| 1 | CHAIRMAN HOWARD: Please be seated. Good |
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| 2 | morning. Thank you for coming. We'll call this |
| 3 | briefing to order, and I'll ask Attorney Melchers |
| 4 | if he'll read the docket. Attorney Melchers. |
| 5 | MR. MELCHERS: Thank you, Mr. Chairman, |
| 6 | Commissioners. We are here pursuant to a Notice of |
| 7 | Request for Allowable Ex Parte Hearing filed by |
| 8 | Progress Energy Carolinas, Inc., scheduled for |
| 9 | today, Thursday, December 1, 2011, at 10:30, here |
| LO | in the Commission's hearing room. |
| L1 | The subject matter to be discussed at the |
| L2 | briefing is: Progress Energy Carolinas, Inc.'s |
| L3 | 2011 Integrated Resource Plan. |
| L4 | Thank you, Mr. Chairman. |
| L5 | CHAIRMAN HOWARD: Thank you. Mr. Anthony. |
| L6 | MR. ANTHONY: Good morning, Mr. Chairman, |
| L7 | members of the Commission. Thank you for allowing |
| L8 | us to appear today and discuss our 2011 Integrated |
| L9 | Resource Plan. |
| 20 | We are going to ask you to please engage us on |
| 21 | three topics, in particular, as we go through this |
| 22 | discussion. One is one that's near and dear to |
| 23 | your hearts, that Commissioner Wright just returned |
| 24 | from Washington on, and that is what is the impact |
| 25 | of the environmental regulations that are being |

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contemplated by the EPA on how we plan and operate

our system, as well as the costs. We would enjoy talking about that with you, in particular.

The second is energy efficiency programs, in particular; meaning, how do we evaluate them and how do we integrate and use them in meeting the needs of our customers. We struggle with exactly how they compete against supply-side resources and how we evaluate the cost-effectiveness of a resource -- of a DSM/EE resource -- deciding when and how to integrate it into the resource plan. all agree they have to be cost-effective but there's a fairly large debate over how you define cost-effectiveness, so it might be helpful if we talk about how we look at the cost-effectiveness test, and that drives which programs and measures we offer.

And then the final thing: Supply-side resources, we all have our bus-bar costs and we say it costs this or it costs that to produce a megawatt-hour from the various resources, but they all have different operating characteristics and capacity factors and fuel supply. Wind and solar are intermittent. Nuclear, a lot of risk associated with building a nuclear plant. Natural

gas is cheap right now; how long do we expect 1 natural gas to be cheap, and then what should we do 2 with regard to hedging and how do you factor all 3 that into picking the supply-side resources. 4 All of this is forecasting. It's going to be 5 wrong. So what we're anxious to hear from the 6 Commission, as well as the other intervenors in our 7 docket, is an open dialogue as to how we should be 8 evaluating those various assumptions and inputs in 9 coming up with a plan, because when all is said and 10 done, we're agnostic. We do not have a bias toward 11 any resource other than we want to pick that mix of 12 13 resources that meets the State's energy policy and that this Commission will allow us to put into 14 15 rates. We're a pretty basic utility. We want to 16 put those resources that you find prudent so you'll allow us to recover the costs. 17 So with that, we have our two presenters 18 today: Glen Snider, who is our director of 19 2.0 Resource Planning; and Chris Edge, who is director of Retail Strategies and Emerging Technologies. 2.1 22 And I believe Mr. Snider is going to kick it off. MR. SNIDER: Thank you, Len. Good morning, 23 24 Commissioners, Chairman Howard. [Reference: PowerPoint Slide 1] 25

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Thank you so much for allowing us to appear today. It's my pleasure to present Progress Energy Carolinas' 2011 Integrated Resource Plan.

We have several slides in our deck today, but we should move through them fairly expeditiously. I would ask that if you have any questions along the way, feel free to interject as we go through these. Of course, we'll have Q&A at the end, but sometimes it can be a little dry just to go through slide after slide. So questions that do come up, please feel free to interject at any point.

[Reference: PowerPoint Slide 2]

By way of an outline, last year we spent quite a bit of time briefing this Commission on the process of planning that we go through. Rather than represent that in sort of a redundant manner, we've made that a much briefer section, just a few quick slides on the planning process, and then we're going to focus a little bit more on some of the key trends in the planning landscape.

The first couple of bullets there, the load forecast, our DSM and EE activities have to do with the demand side of the planning equation, while fuel prices and environmental regulations influence the supply side of the equation. While there are

many more inputs into planning, these are just a few of the highlighted ones we'd like to cover with you today. Ultimately then, we'd like to conclude with what is the result of our 2011 Integrated Resource Plan, what are some of the key takeaways from our 2011 plan, summarize some of those, and then, again, finish up with some Q&A.

[Reference: PowerPoint Slide 3]

So jumping right into the planning process, you know, what is the objective of resource planning. Mr. Anthony just spoke about, you know, we have an objective in planning to reliably serve our customers and meet not only their demand needs but their energy needs in a cost-effective manner, utilizing a balanced mix of both supply-side and demand-side resources. And while that's easy enough to say -- reliability, cost-effective, balanced -- those things can mean different things to different people. So what I'd like to do is unpack those a little bit.

[Reference: PowerPoint Slide 4]

When we talk about reliability, we have firm obligations. First of all, as a planner, we have to serve our firm retail/wholesale obligations. In terms of a planning reserve, that means carrying

1 adequate capacity, plus reserves, to serve that load. We use a long-term capacity margin of 11 to 2 13 percent. Real quickly, again, capacity margin 3 is the amount of capacity you have in your 4 portfolio, less the load you're obligated to serve; 5 divide that all by capacity. Other people in the 6 industry will use reserve margin. Basically the 7 same formula, except you divide by the load you're 8 serving rather than the capacity on your system. 9 And then we also have to ensure operational 10 11 reliability. So what we mean there is beyond just planning reserves, we have other reliability 12 13 criteria, such as fast-start, spinning, what we

to maintain a reliable electric grid.

So these are all reliability factors that we're looking at when we're planning. I will note that going into next year, we are looking at a renewed capacity margin/reliability study. We'll be validating if the 11 to 13 percent is still correct. That may be adjusted as a result of that study. But for the 2011 IRP, that's the capacity margin target we used.

call operational reserves that we have to maintain,

VICE CHAIRMAN WRIGHT: Mr. Chairman, quick question here. Is the reserve margin -- you

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| 1 | mentioned reserve margin is determined one way and |
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| 2 | capacity margin is determined another way. Is one |
| 3 | a better choice to use than the other, or do they |
| 4 | I mean, you mention they're kind of the same but |
| 5 | they're not, so |
| 6 | MR. SNIDER: Really, Commissioner, they're |
| 7 | interchangeable to the extent that they're both, on |
| 8 | the numerator, measuring the amount of excess |
| 9 | capacity you have |
| 10 | VICE CHAIRMAN WRIGHT: Right. |
| 11 | MR. SNIDER: above your load expectation. |
| 12 | And whether or not you divide by capacity or |
| 13 | reserves, it's just a nomenclature issue that I |
| 14 | think has some legacy implications of where they've |
| 15 | evolved. Frankly, as a planner, I'm indifferent |
| 16 | because I can transpose one directly to the other. |
| 17 | VICE CHAIRMAN WRIGHT: That's what I wanted to |
| 18 | hear right there. Okay. Thank you. |
| 19 | MR. SNIDER: "Least cost." Cost-effective |
| 20 | sources that meet the load-shape needs. What do I |
| 21 | mean by that? |
| 22 | Least cost is the minimum present value of |
| 23 | revenue requirements of a given plan. If you think |
| 24 | about minimizing revenue requirements, you're |
| 25 | really minimizing customer dollars per kilowatt- |

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hour. And so to do that, we're looking at each plan and seeing what is that total revenue requirement to serve that plan. The load-shape needs, the reason we put those words in there is, as you're minimizing that, you may need in certain years peaking capacity, intermediate capacity, base-load capacity, so it's not just "I'm going to always build peakers because they're the cheapest dollar-per-kW to build." You have to take into account how much are those units going to run, and what are the economics when you consider their capacity factors.

And then "balanced." Flexible and responsive to a customer's needs. So fuel diversity, as Mr.

And then "balanced." Flexible and responsive to a customer's needs. So fuel diversity, as Mr. Anthony pointed out. We're going to have some slides on this later, so I won't spend too much time with this, but it's important to maintain fuel diversity so that you're not serving all of your customer needs from one particular fuel source. Environmental responsiveness: In particular, we have to comply with all Federal and State environmental regulations. So each of the different resource alternatives have different environmental footprints. In total, we have to be compliant with all State emissions -- and water,

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solid waste limits -- that are imposed upon us.

And then operational flexibility ties back into the operational reliability, where you have flexibility on your transmission grid.

[Reference: PowerPoint Slide 5]

So in determining these, we start with what is that firm obligation, plus reserves. So this is the target long- -- this is your long-term need, if you will, say out in the year 2020. From that long-term need on your load forecast, you reduce it by your planned activities in energy efficiency and then load control. So load control programs, such as our EnergyWise Program, our Voltage Control Program for our interruptible customers, where we can temporarily take load off the system, as opposed to an energy efficiency program that has more of a systematic reduction in load -- Chris will talk more about that later.

So that gives us down to a net need at some point in the future. To the extent that net need is above your projected -- or, is above your existing resources, you have a projected gap to fill. That can be filled with a variety of supply-side options, including operating your existing units, building new units, purchased power, and

| 1 | renewables. |
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| 2 | [Reference: PowerPoint Slide 6] |
| 3 | So how do we do that? |
| 4 | COMMISSIONER HAMILTON: Excuse me. On the |
| 5 | slide you just left, on the top you've got your |
| 6 | demand-side options energy efficiency and load |
| 7 | control. |
| 8 | [Reference: PowerPoint Slide 5] |
| 9 | What percentage is that? |
| 10 | MR. SNIDER: Right now, Commissioner and |
| 11 | we'll have some more slides coming up on this, so |
| 12 | hopefully we'll be able to answer that with hard |
| 13 | numbers. We will build to, over the next five |
| 14 | years in our plan, over I think it's 5 |
| 15 | percent of our total energy. And I'll let Chris |
| 16 | correct me if I'm wrong, when we get to that point. |
| 17 | And we are looking at a total of, I believe, almost |
| 18 | 1,600 megawatts over the total planning horizon, of |
| 19 | capacity. So basically, a couple of large power |
| 20 | plants, in terms of capacity, and 5 percent of our |
| 21 | energy, over the next five years. But we'll have |
| 22 | some more detail on that, coming forward. |
| 23 | COMMISSIONER HAMILTON: Thank you. |
| 24 | [Reference: PowerPoint Slide 6] |
| 25 | MR. SNIDER: So this very colorful slide, |

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which can get very busy, really is trying to represent a fairly complex planning process. And really there are several drivers that drive what type of resources and how many resources you're building. And we've named just a few of them there on the far left. So we start by taking individual sensitivities to each one of those drivers independently and saying, "If you vary those independently, how does that change the plans you might pick?"

You ultimately get far too many plans to

You ultimately get far too many plans to evaluate in-depth, so you consolidate like plans. For example, several of the plans are just slight variations of another, so Plan A might be an all-gas portfolio that's CTs and combined-cycles, where Plan B might be a mix of some gas and some regional nuclear, and maybe Plan C is heavy nuclear including regional and self-built. So when you consolidate into these like plans, you then run scenario analysis against a finite number of plans to see how they perform under various attributes and measures, and then you ultimately come out with a recommended plan that really has the best results across multiple possible future scenarios. And so that's, in a nutshell -- again, to go through this

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rather quickly, compared to what we did last year
-- how we conduct our planning process.

[Reference: PowerPoint Slide 7]

So I'll pause for a moment on the process, if there are any questions, and if not, we'll move into the some of the trends we're seeing in the planning landscape.

[Brief pause]

[Reference: PowerPoint Slide 8]

Let me start with our load forecast. Load forecast is conducted as a summation of several sectors that are forecast individually. So we start with our residential sector, and there's really two drivers to the residential sector. It's the number of customers and the use per customer. So our load forecasting group runs a regression analysis against population, and I believe use per customer is regressed against personal income as a proxy for use per customer that comes in your regression analysis, and when you get -- the combination of those two drives your residential growth. And we're going to have slides after this that show what's happening with residential growth, but I'm going to go through the process on each one first.

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Commercial is driven by commercial employment, and what we're seeing in commercial employment drives the load. That's been a regression analysis that's held steady over a period of time.

So these first two are done very statistically oriented in nature, and they represent about half of the load. So residential and commercial is about 50 percent of the energy we serve, and we forecast that using statistical methods.

You get into industrial, and it's far more of a finite forecasting, where you're actually talking to your industrial customers; you have account reps dealing with each of the customers; you're working back and forth to see are you adding shifts, are you deleting shifts, are you expanding facilities, are you importing jobs, exporting jobs; and our load forecasting group is getting direct feedback from the customer and our customer reps.

Same thing with our military bases. There, we have individual account reps for each of the military bases. You have discrete events happening, such as base realignment that, rather than being statistical in nature, are very discreet in nature, so our load forecasting group works directly with the customer and our military account

reps to come up with the forecast on our military load.

And then wholesale, really there's a couple of different ways we forecast our wholesale load. The very large wholesale customers are large enough in size where they have their own forecasting groups and they simply communicate their forecast to us and we incorporate these forecasts into our overall load forecast. And for some of our smaller ones, we actually work with the customer, the account rep and our forecasting group, to provide forecasts on behalf of the customers.

So, by and large, this is probably 95 percent of our load. We do have some small street-light load that's in there, some losses. All of this, I should say, is done at the gross level, so this is before losses and before any DSM and EE activities.

[Reference: PowerPoint Slide 9]

The results of all this -- and unfortunately, the trends are not pretty -- from a load forecasting perspective, since I've been in this role, we've seen nothing but declines from the economic downturn. You know, we were here last year I think talking about V-shape and U-shape and what type of recovery are we going to have, and

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we're still having that same debate. So if you look sector by sector, what you will see is continued decline in our load forecast. So year over year over year, from '8 at the beginning of the recession, through today, if you start with the residential, you can see in all cases you've got decline.

A couple of points here: Residential and commercial, the two that are done statistically, are fairly straightforward and you can see the results of those forecasts. On the industrial side, there was a point where in '10 we thought we were going to see some industrial recovery; we had some positive indicators. It's important to put that in perspective to number of megawatts, so the drop from the blue line down to the now-red line in 2011 is about 50 megawatts. So while there is a decline in industrial, relative to the size of some of the other quadrants, it's not as large as you're seeing in residential or commercial. Wholesale, the steep increase that you see right there in 2012 is some new wholesale load that's coming on-line in 2013 that wasn't signed up in 2008. So, 2008 did not reflect that load, so you can somewhat ignore the green line. When you go to 2009, '10, and '11,

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you're seeing a reduction in the wholesale load, as well, with the drop from 2009 -- which is the yellowish line -- down to the '10 and '11 levels that you see there, just at the 4,600 megawatts at the end of the forecast horizon.

So what we do in total is add these all up.

So you've got what's happening in each of the sectors. We bring them all together, and you get a cumulative load. Before we, you know, show the total, I thought I'd show just a couple of drivers that, while these aren't the exact variables that are used in the regression, I think it's telling.

[Reference: PowerPoint Slide 10]

If you look at unemployment and think about use per customer being driven by personal income, you've got still very high unemployment, compared to past periods in this decade, both in North and South Carolina. So that is not only weighing on the use per customer, it's also weighing on the number of people moving into our area. The number of children moving out of the home as they graduate college to create their own home and their own electric account is declining as unemployment rates are up. So this unemployment rate clearly is having a drive on electric demand.

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[Reference: PowerPoint Slide 11]

When you move into the commercial and industrial sector, also not a pretty picture in terms of, in just three short years, what has happened to GDP forecasts. The lines -- what you're looking at there is a 2000 index, so the 1.0 would be GDP in 2000, and then how was it expected to grow, real GDP, from a 2000 perspective. You see a very significant drop in GDP over that horizon. I think it's about a 10 percent drop on average, in just three years, in GDP forecasts. So that's weighing on that commercial and industrial sector, such that when you put this all together --

[Reference: PowerPoint Slide 12]

-- you do see a total gross demand that we're forecasting for summer, year over year over year, for the last three IRPs to be declining.

And again, a big part of that is the starting point from which we are recovering out of this recession. We still expect long-term we will return to population growth in the Carolinas. By way of example, we've had 25,000 customers a year come into the Carolinas for year after year for a decade. Over the last few years it's been 8,000, 9,000. Last year -- this year, rolling 12 months,

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it's only 4,000 new customers, compared to 25,000 1 on average. Well, you would think that, long run, 2 that's not sustainable. We will still have 3 population growth. This is still projected to be 4 an economic area that people want to relocate to, 5 so as you come out of this economic downturn we do 6 expect that positive slope. It's just starting 7 from a lower point at the beginning point right 8 9 now. So I guess the silver lining of this, we do 10 expect a return of population growth to this area. 11 We do expect to have economic growth in the long 12 13 run. It's just a question of how this recovery is 14 going to unfold. 15 So with all that said, this is all done, again, at the gross level before reducing for DSM 16 or EE. When we plan, as we pointed out earlier in 17 18 our process slides, we plan to meet net load after 19 DSM and EE. And so I'm going to turn this over to 2.0 Chris here in a minute, and let him talk about some of our DSM and EE efforts. 2.1 [Reference: PowerPoint Slide 13] 22 CHAIRMAN HOWARD: Mr. Snider, could we ask --23 could I ask you a question on forecasting before

you go to that?

MR. SNIDER: Certainly, Chairman. 1 CHAIRMAN HOWARD: On Slide 8, you mentioned 50 2 percent residential and commercial, but you didn't 3 mention any percentage for industrial, military, 4 and wholesale. Or I didn't catch it. 5 [Reference: PowerPoint Slide 8] 6 MR. SNIDER: Yes. So, residential is 28 7 percent of our energy sales; commercial is 22. 8 Industrial is 17; military is 3 percent; wholesale is 27. You will notice those numbers do not sum to 10 100, because all of this is measured at the 11 generator level, so there are some line losses 12 13 involved, and there's also a little bit of street 14 lighting and governmental sales that aren't in that 15 number, but this is the vast lion's share of our load. 16 CHAIRMAN HOWARD: You mentioned also -- I 17 18 guess page nine would be it. But you've got a tremendous -- you mentioned new wholesale coming 19 2.0 on-line, and that will be increasing in '13? [Reference: PowerPoint Slide 9] 2.1 MR. SNIDER: Yes. 22 CHAIRMAN HOWARD: What are some of the 23 wholesale accounts that would use that much 24 capacity? 25

MR. SNIDER: What this is, Chairman Howard, is 1 the addition of some NCEMC peaking load that I 2 believe they were purchasing in the past -- I 3 believe some from Southern Company, and I'm not 4 sure where the rest of the purchases came. They've 5 rolled that into a requirements contract from 6 Progress Energy Carolinas, and so we will be 7 picking up that load, starting in 2013. 8 CHAIRMAN HOWARD: Is it -- and I know what 9 you're going to say, but I'm curious. Progress 10 Energy/Florida plays nothing in this -- I mean, 11 purchased power, anything, any type of affiliate 12 13 transaction, or anything? Progress/Florida --Progress Energy/Florida has absolutely nothing to 14 do with these slides, wholesale or otherwise? 15 MR. SNIDER: That is correct. 16 17 CHAIRMAN HOWARD: Okay, thank you. 18 **COMMISSIONER HAMILTON:** Let me ask -- Mr. Chairman -- just one question, and it's more 19 2.0 curiosity on my part. On your growth, your need 2.1 has reduced for the last three years. But don't 22 you still have a peak day that sets records during the summers? 23 MR. SNIDER: Yes, sir. And on the demand 24 slides -- let me go to this slide right here. 25

| Т | [Reference: PowerPoint Sinde 12] |
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| 2 | this is projected to be that peak demand. |
| 3 | COMMISSIONER HAMILTON: Right. |
| 4 | MR. SNIDER: Now, I will caveat that by saying |
| 5 | this is peak demand under expected weather |
| 6 | conditions. So when we talk about a reserve margin |
| 7 | or capacity margin, part of the reason for that |
| 8 | extra cushion is to deal with abnormal weather, as |
| 9 | well as unit outages. But given normal weather, |
| LO | this would be peak day forecast on slide 12 here. |
| L1 | COMMISSIONER HAMILTON: Thank you. |
| L2 | COMMISSIONER HALL: I just have one question, |
| L3 | Mr. Chairman. The 4,000 new customers, is that |
| L4 | combined in South Carolina and North Carolina? |
| L5 | MR. SNIDER: Yes, Commissioner. |
| L6 | COMMISSIONER HALL: And that's in the last |
| L7 | just two years, or |
| L8 | MR. SNIDER: 12 months, October to October. |
| L9 | COMMISSIONER HALL: Okay. How about 2009? |
| 20 | MR. SNIDER: Let me see if I have that number. |
| 21 | COMMISSIONER HALL: I mean, if you don't have |
| 22 | the exact number but 4,000 just seems a very, |
| 23 | very small number. |
| 24 | MR. SNIDER: I think we added 10,500 in '9. |
| 25 | COMMISSIONER HALL: Okay. |

MR. SNIDER: So it is very small. 1 COMMISSIONER HALL: 2 Disturbing. MR. SNIDER: And that's why we're thinking it 3 will not -- you know, given population growth, 4 economic trends toward this area, that that's not 5 sustainable in the long run. 6 **COMMISSIONER HALL**: Okay. Okay. 7 MR. ANTHONY: Mr. Chairman, just to be clear 8 on the wholesale load. NCEMC is the North Carolina 9 association of electric cooperatives. All of that 10 load is in our control area that we are serving. 11 None of it is outside our control area. 12 CHAIRMAN HOWARD: Thank you. 13 MR. SNIDER: Okay. If there are no further 14 15 questions, I'll turn it over to Chris to talk a little bit about our DSM and EE. 16 17 MR. EDGE: Okay. Thank you. I thought I 18 would first start -- Mr. Anthony shared with you 19 one of the objectives today was to facilitate some 2.0 dialogue as to how we choose our DSM and EE 2.1 programs, and in essence how those result or how 22 those are embedded into our long-term forecasts. [Reference: PowerPoint Slide 14] 23 And I put together this illustration to really 24 walk you through that process, and thought we might 25

take a minute or two to step through this. So this is, by itself, the process that we use to identify programs. It's the same process which we use to identify long-term market potential, and it's completely consistent with the cost-recovery mechanism that we currently operate under and was approved by this Commission.

I'll start on the left side and admit to you that this is not a common industry term, that this is a Chris term. But we first start with this universe of measures. And really, the emphasis here is there is no predetermination from the beginning of this process as to what is a good measure or a bad measure. We start essentially with all measures.

And we take this through the screening process, and then we next step to a qualitative screen. So we look at this universe of measures from the perspective of the technology maturity, and are they in production or are they just a Popular Mechanics article and something still sitting in the garage or the laboratory of an inventor. We then look at climate applicability, as well as demographic applicability. What I mean by demographic applicability is, if we see a

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measure within this universe of measures that may very well be a measure that's applicable to a 50-story residential dwelling, then that doesn't have a likelihoodness of applicability to the Progress Energy territory -- something more over to certainly a more urban territory. So we take this universe and we've narrowed it somewhat by this qualitative screening.

The next step is this screening of measures. And at this point, we are screening these measures from and really determining their economic efficiency. So we again -- we're taking the full participant cost, regardless of who pays for it, regardless of whether there are any incentives, and what we're doing is comparing that full participant cost of that investment towards the deferred supply-side requirements. And the intent here is that we don't want to incorporate into our portfolio any measure by itself that is not economically efficient. We don't think it's prudent on our part to advise and/or promote things to our customers that are economically inefficient. So we've screened these measures at this point from an economic efficiency standpoint.

So then we're sort of left with even a more

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narrow view of measures, and then what we do at this point is we start bundling these measures. We start grouping them according to similarities. Can we leverage similar market channels, are they intended for the same end -- you know, we bundle residential measures together, we look at commercial measures together, and we start forming programs. And in this step in this bundling of measures, we also start -- which is one of the more difficult things to do in the planning process, is to try to provide some projections of what participation would be. Again, all of our programs are voluntary in nature, so we have to take into account what the potential economic impacts would be to future participation. We incorporate into this observations made by other utilities that are running similar programs. We also -- one of the real dynamic parts of this particular part of the screening process is trying to account for what we see on the horizon as far as code changes, so there are a tremendous number of code changes that are being employed by DOE. One that was approved this past week, as an example, that by January 2015, the SEER requirements of HVAC here in the Southeast will increase to what is currently a SEER 13 up to

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a higher-efficiency SEER 14 unit. So, what you see 1 as a result of that DOE adoption of that code and 2 standard is now what's going to happen, come 3 January 15th, or sometime prior to that because of 4 market dynamics, you're going to see the baseline 5 change, which means inevitably, you know, the 6 overall energy savings reduction from higher 7 efficiency SEER units are going to be diminished, 8 and therefore will either deteriorate or completely 9 eliminate any type of energy savings opportunities 10 that could be accounted for in our utility planning 11 process. They still are going to be -- you know, 12 13 what's going to happen, in essence, is at that 14 point the energy savings will be transferred to Glen's load forecast rather than showing up in our 15 16 future projected forecast. 17 So this is the part where we bundle measures, 18 we look at the market potential, and then finally we come to and we do our final cost-effectiveness 19 2.0 screening. And in cost-effectiveness, we look at 2.1 four tests. We look at the rate impact measure, 22 which is sometimes referred to as a nonparticipant

participant test. And then the primary test that

we use for screening programs at this point are the

view or a nonparticipant test. We look at a

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total resource costs, which is really -- in a very simplistic manner, it's a matter of taking that participant test and you take that nonparticipant test, and you put the two together and you get the total resource cost test, and that's the primary measure by which we measure efficiency programs. And then of course, the utility cost test, which is looking at the economic viability of that program from the purview of the utility.

And so we screen those programs and in our approved cost-recovery mechanism, we look at something slightly over 1.0 -- which is 1.05. then where we've gathered to in the whole selection process is we have this developed portfolio. have a portfolio of options at this point. And so these are the programs which we've identified and brought before this Commission over the past two to three years and which we are currently operating under, and we've got some other programs we're looking at in the hopper. But what I do want to emphasize is, it does not stop there; this is a continual, perpetual process, because we're out operating these programs over here in implementation, and then we have a very, very key component, which is the continual measurement-and-

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verification. Are we getting what we had expected? What's happening within the market? Are the energy savings there? So we're back to measuring the original objectives of the portfolio, which were the energy and the demand reductions associated with these, and were they, in fact, cost-effective, and we also look at other objectives of the program, which are we accomplishing the bill savings that are attributable to the programs, as well as what's the impact of rates. And then, you know, what we think is an important component as well, the overall education awareness. So we continue to go back through this cycle on a perpetual basis.

I sometimes get questioned: Well what about those technologies that we eliminated from a qualitative perspective? We all read the articles. We see the new promising technologies that exist. You might have eliminated those again, initially, so what happens when they become viable? Well, if you adhere to this process on a very regular and periodic basis, then you pick that up. I mean, each time you move through this loop, you're going to bring back in those new technologies that, in essence, can be incorporated into your portfolio at

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that point. So the key here is, it's a very 1 defined process, there's no predetermination of 2 measures. And right now, we're screening those 3 programs according to total resource cost and the 4 utility cost test. 5 And I'll pause for a second. I hope we've 6 simplified some of this discussion, but see if, in 7 fact, you have any questions or any comments 8 related to this process. 9 10 [No response] And what's resulted -- I'll move to the next 11 slide, again, just a brief overview. 12 13 [Reference: PowerPoint Slide 15] So using this process, we've -- I'm going to 14 15 highlight the programs that have currently been approved by this Commission, and maybe share with 16 17 you a little bit about the highlights around each 18 of those initiatives, some of the challenges and opportunities. I'll start on our residential 19 2.0 portfolio. EnergyWise Home, Len alluded to earlier; 2.1 22 that's our dispatchable load-control program. Since we launched that program in the 2009 23 timeframe, we have -- it was mid-2009 when we 24

launched that program -- we currently have,

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systemwide, 73,000 participants in the program.

We've been aggressively marketing that program.

That program, in fact, is one of the programs that is cost-effective across each of those four tests that we shared to you. It's a very important component, as well as our long-term resource plan, as we look at serving the peak demand needs that were alluded to earlier.

Just kind of stepping through this -- and I probably won't go through in detail on each of the programs -- Home Advantage is the label we provide to our residential new-construction program. When we designed this program, we were still adding 25,000 homes a year. As we just talked about, we have not seen that level of activity, so certainly it's a program that has struggled relative to the original projections of what we had anticipated in it. And as such, recognizing what we think will continue to be current economic challenges, combined with the fact that DOE now is imposing even stricter standards around Energy Star, we'll be coming back before this Commission with a completely revamped new-construction effort that we think will help address all those different factors and provide even greater opportunities for

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construction starts here in the State of South Carolina. So we're going to look at some prescriptive options there, and we're going to look at some very, very aggressive financial opportunities for builders to look at whole-house new-construction opportunities, as well, that are no longer tied to that DOE Energy Star Program.

The Home Energy Improvement Program is the

The Home Energy Improvement Program is the program that we have -- that's the program that's available to all our residential customers. We have rebates for HVAC, for windows, for other types of -- duct sealing and testing. The program's really on par with our forecast. We've had, to date, over 52,000 participants in the program.

Just a side note, the person that actually manages that program resides in Sumter, South Carolina. So he manages the entire program across our Carolinas portfolio.

The Residential Lighting Program continues to be, very much like any other utility around the country, a very key component and driver for energy savings within the DSM and EE portfolio. For us, to date, since the inception of our portfolio, it accounts for roughly 47 percent of our total overall energy savings within the program.

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I shared with you some details about this before. This program is very wide in its reach and one of the very encouraging things is that it's applicable really to all of our customers, regardless of income, regardless of location. It's available in over 400 different retail locations across the service territory, over 45 different retail locations in South Carolina, and those extend from big-box home improvement stores to your major discounters to Goodwill locations where we have availability for people to participate in this program with very low-cost, first-cost type opportunities.

So, again, a program we've leveraged to a

So, again, a program we've leveraged to a tremendous amount of success to our customers, as far as generating overall bill savings, but also one that -- again, that comprises 47 percent of our savings, but as I alluded to earlier, DOE changes. We know that the EISA standards were adopted that start to go into phased effect between 2012 and 2014, and that's the Energy Independence & Security Act, which imposes higher, more stringent standards on residential lighting. So I think all utilities and utility planners, and DSM and energy efficiency planners are all really trying to anticipate what's

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really going to happen as a result of those 4 program, thus far today. 10 We have an Appliance Recycling Program which 11 12 13 14 15 16 17 18 19

Is that automatically going to make the CFL bulbs the default bulb of choice? We know that the major lighting manufacturers are out designing new incandescent type technologies that will meet the EISA standards. You know, so again, another purpose of that continual, perpetual process of continuing to look at technology, its availability, and its cost. But a lot of success out of that

encourages the customers to dismiss the use of their secondary beer refrigerator. We've been successful in targeting over 9,000 participants in that program. And if you'll recall, we not only remove the refrigerator from use, but we also dispose and recycle up to 95 percent of the components associated with that refrigerator.

We have a Home Comparison Report Program that this Commission approved earlier this year, that's really intended -- it's targeted towards -- it's a direct-mail to customers that really allow them and we provide comparisons of how their usage looks towards their neighbors. It's intended to be a behavioral component driven program which people

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drive under their own accord a decision to reduce their usage, and they're able to base that and compare that to their neighbors.

And we also had, very early in the promotion of our portfolio, a Residential Solar Hot Water Heating Pilot. That pilot is about to come to finality. We're towards the end of the intended study. And what we had focused on there was looking at solar hot water heating technology as a potential energy efficiency technology. There's a lot of uncertainty as to what the true energy savings were, what the real demand savings, and moreover, how much -- you know, what's the real participant cost associated with that. So we'll be evaluating the results of that pilot at its conclusion, and then making a determination as to whether that's something we can look at within our portfolio on an ongoing basis.

Low income, this is obviously a very, very key component of our efforts within our entire portfolio. It's -- our Neighborhood Energy Saver Program is one that has tremendous documented success. Far exceeded the expectations over than when we originally launched the program. It's been recognized within the industry as a best practice.

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We're obviously -- we understand that; we're contacted by many utilities. But if you'll recount_[sic], that's a program where we literally -- we go down the streets, we knock on doors within identified neighborhoods that have a certain density of low-income population based on poverty levels. And once we, through the agreement of the customer, we ingress the home, we're there installing measures and we're there providing one-on-one consultation with the customers.

When we launched this program, we had some framework of it in place in Florida, and at the

When we launched this program, we had some framework of it in place in Florida, and at the time had roughly -- within identified neighborhoods, we were expecting, based on best accounts, somewhere between 50 and 60 percent participation, is what we were expecting. We've operated this program over two years now; we're getting 86 percent participation within identified neighborhoods. So we don't take full credit for that, because the way and the premise on which that program works is we engage community leaders -- whether they're mayors, whether they're politicians, whether they're church leaders; community leaders are defined different by the communities in which they serve. They're there to

be a supporter, and we are there to be a provider of these services, as well.

Specific to South Carolina, we've completed 786 homes in Florence, 549 in the Marion area. Our crews are currently in the Dillon area in an 1,100 home neighborhood that we intend to complete by the end of December. And we'll be kicking off a new initiative on January 4th in the Kingstree, South Carolina, area. So to date, over 30 percent of the homes that we have reached -- which are over 9,000 on a system basis, but over 30 percent have been in the State of South Carolina with this program.

VICE CHAIRMAN WRIGHT: Question.

MR. EDGE: Yes.

VICE CHAIRMAN WRIGHT: How long does it take you to set that up, to make the introductions and get, you know --

MR. EDGE: That's a great question. Really, we start -- we've identified these neighborhoods and we've identified the parameters. So several months in advance of actually entering the neighborhood and physically doing work, we began to identify and contact our community leaders. We leveraged the relationships that we had through our community relation managers. And then what happens

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as far as the process, then we begin by providing direct mail to identified customers who are able to participate. And what we're doing is we're notifying of the program, but we're also inviting them to a community event. So we have a community event at the very beginning of these, at which we serve a barbecue dinner and we go over the program, and we try to ingrain trust within the customers, telling them what it is exactly we're going to be So this is a couple of weeks prior to the launch of the program. Then, as we get a week away, we begin by hanging door hangers on customers who are participants, saying, "We're going to be in your neighborhood, and we're going to be available to actually perform this service on your house on X date, between the hours of..." We've also, by that point, as well, have put signs at the corners of the streets within the neighborhood to say, "Hey, Progress Energy's going to be in the neighborhood," and "Call this question_[sic]" so if a customer can't be there on that specific date -- and I think this is one of the very, very key reasons we've been successful in getting that 86 percent penetration rate -- then we work with that customer. We're not going to confine you to only that, but

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if, by chance, you're at work and you can't be there, or can't make accounts for it, then we'll allow you to call and we'll come back and schedule, and we'll try to accommodate the needs of the customers. We'll come back on Saturday, if necessitated, as well.

VICE CHAIRMAN WRIGHT: Very grassroots.

MR. EDGE: It's a very, very grassroots effort.

So when we launched this, the types of measures were what I would refer to as -- when we launched, it was in and around the time that the stimulus money had been approved and the states had been provided some very large weatherization funds, and we certainly didn't want to compete with other available funds that were available for this marketplace. Those are starting to come -- and I think each of the states will wean themselves of those funds here over the next year or two. So, when we look at this, I think this is a tremendously opportunistic area for the utility to pursue low-income, leverage this type of success and say, "What else can we do?" If we're getting an 86 percent penetration rate, if we're having the opportunity to spend the one-on-one time with our

customer, then what are those other harder-hitting 1 measures that we can provide to support the needs of our communities that are stressed relative to 3 poverty or income issues. 4 But to answer your question, it starts many 5 months in advance. It then starts with the community leaders for just a couple months. 7 start engaging customers several weeks prior to. 8 And then, as an example, if we're in an 1,100 home 9 community, we'll be in that community for almost 10 three months. It takes us three months. So we're 11 there, we're present, we're actually a part of the 12 13 community for three months. VICE CHAIRMAN WRIGHT: Okay. Thank you. 14 15 **COMMISSIONER FLEMING:** Now, how is this program funded? Is this through the ARRA --16 MR. EDGE: No. this --17 18 **COMMISSIONER FLEMING**: Is ARRA a part of that? 19 MR. EDGE: This program is funded through our 2.0 DSM and cost-recovery clause. It was one we brought before the Commission and it was approved, 2.1 22 so it's funded through our clause. COMMISSIONER FLEMING: So this can be self-23 24 perpetuating, then. MR. EDGE: Sure. 25

1 **COMMISSIONER FLEMING**: It's not dependent on any outside funding. 2 MR. EDGE: That's correct. The funding comes 3 entirely through our clause. This is one that we, 4 when we requested approval from the Commission, we 5 bypassed the opportunity for incentives. We said, 6 "You know, it's the right thing to do." We 7 bypassed -- if you'll recall, we have a performance 8 incentive that's available for some of our other 9 efficiency programs, but -- but it's funded through 10 this clause. 11 **COMMISSIONER FLEMING**: Let me just ask 12 13 something. You know that I'm in full support of demand-side management --14 15 MR. EDGE: Sure. 16 **COMMISSIONER FLEMING**: -- and energy efficiency measures. I think it's very much 17 18 needed. But we're hearing about the load forecast 19 going down. Are we -- does this play into that? 2.0 I'm sure it has to, because you're saving energy, 2.1 electricity. So the real question is, the more 22 successful you become with these measures, is keeping the company whole as the use of electricity 23 goes down, right? 24 MR. EDGE: That's exactly right. And I think 25

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that's largely to the point Mr. Anthony made earlier about meeting the objectives and the policies of the State when, in essence, our desire as a utility is to adhere to those policies that have been established by the State but also meet the needs of our customers in a reliable -- and a manner that is cost-effective, and at the same time allows the company to continue to make earnings that provide value to our shareholders. And it's a very complicated equation. And yes, it does; it has a diminishing effect on our ability to provide future sales, as a result of these efforts. And I think that's one that personally needs -- that stays in continuation of the decisions that policymakers like yourself have to continue to make and we have to work together to address those types

That specifically -- some of that, to a degree, has been addressed, because there was a lost revenue adjustment mechanism that was approved by the Commission as part of our cost-recovery settlement to help address some of the issues which you describe. So I think, on a future-looking and forward-looking basis, should they have even larger impacts, those are the type of things we have to

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1 keep and maintain in the dialogue. **COMMISSIONER FLEMING:** The whole picture has to be there, depending on --3 MR. EDGE: That's correct. 4 COMMISSIONER FLEMING: -- if that's the result 5 that you want, which certainly seems plausible to 6 me, you have to keep that whole picture there to 7 maintain the stability of the company. 8 MR. EDGE: Yes. 9 Anything you want to add, Glen? We're going 10 to give you a little bit of reflection as to what 11 we see in the long-term forecast basis of these 12 13 impacts. But did you want to add to that? MR. SNIDER: No, I would concur with what 14 15 16 17 18

Chris said. As you think about it, as you defer more and more generation, there is a diminishing return of scale that you have to put in that complex equation Chris mentioned. So as he goes through that perpetual loop of looking at these, as you reduce the next bundle of DSM, it may not look as good as that first bundle did, as you head further and further down that load forecast. So that's something that, in this perpetual nature of how we do portfolio planning for DSM and how that integrates into the Integrated Resource Plan, we'll

1 be taking into account. **COMMISSIONER FLEMING:** But factoring in the savings of the generation of it, too --3 MR. SNIDER: Absolutely. 4 **COMMISSIONER FLEMING**: -- helps balance it 5 out. 6 MR. SNIDER: Yes, ma'am. 7 MR. EDGE: So I would expect that, in the 8 future planning horizon, we'll be coming back 9 before the Commission and you'll see -- absolutely 10 see our intent of looking at ways we can capitalize 11 on this tremendous success we've had in our low-12 13 income communities and further expand on that 14 success. And that's certainly something that's on 15 our radar screen in the short planning horizon. 16 Certainly, we have energy efficiency 17 opportunities to our business customers, as well. 18 We have an overall comprehensive program for all of 19 our nonresidential customers, and that's a program 2.0 that, while it only fills one line of description, 2.1 it's comprised of about 80 different prescriptive 22 measures and a custom measure. And by the very 23 nature of the custom measure, really what's depicted in that energy efficiency program is, we 24 will incent any measure and have the capability to 25

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1 incent any measure that is cost-effective for our nonresidential customers today. So if we don't 2 have a prescriptive measure that maybe addresses a 3 specific light or a specific HVAC opportunity, then 4 we have an ability through this custom program to 5 take that opportunity that's presented to us and/or 6 developed with us, run it through the screening, 7 and provide a very aggressive incentive to 8 encourage that energy efficiency investment. 9 That business program by itself constitutes 10 about 27 percent of our -- excuse me -- over 30 11 percent, 31 percent of our total energy savings 12 13

since the inception of our portfolio.

One of the challenges -- while that program is available to all of our nonresidential customers, one of the challenges of operating the portfolio is really what I refer to as a hard-to-reach business customer. And I might describe that as a small business owner in a strip mall shopping center that's not going to have that direct account management relationship with us, that quite frankly is probably not going to be too concerned with energy usage, is probably going to be more concerned about cash flow and whether or not my employee's going to show up at 3 o'clock like they

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were supposed to. So there are a lot of -- and very likely, doesn't own the facility, so if they make any type of infrastructure investment, they're only going to be able to make the enjoyment of the payback for the time of which they're leasing the space. So it's a very hard-to-reach market, with a lot of barriers that exist relative to providing energy efficiency opportunities. We recognize that.

We are currently in the latter part of a staged program for small business owners that's called a Direct Install Program that we'll be bringing before the Commission the first quarter of next year, which is intended to -- in somewhat of an analogous manner to the NES Program, we show up to the business owner, we have a -- we do an inspection and review and an audit of the facility, we identify those real high opportunities for energy saving. And by the time we leave, if the business owner is content with it -- it's not a free service, but it's a very, very high-leveraged incentive program. But by the time, if there's consent from the business owner at that point, we'll go ahead and we'll have an install date which we'll come by and supply and install those

measures. So it's called a Small Business Direct 1 Install Program, which is addressing a market need 2 -- not an end-use technology need, because we've 3 identified it and it's available there, but this is 4 to address the market barrier need, so it will be 5 another program we have. 6 We have a Demand Response Program for our 7 nonresidential customers, again, a dispatchable 8 9 program. And then I'll make note of our grid 10 modernization efforts. This is obviously a 11 tremendous program that doesn't require voluntary 12 13 participation. But these are the -- this is the 14 peak demand reduction program through the equipment 15 and technology advancements. In 2012, that 16 contributes to 241 megawatts of dispatchable 17 capabilities that we've added to the system over 18 the past three to four years, as a result of that initiative. 19 2.0 [Reference: PowerPoint Slide 16] So --2.1 22 VICE CHAIRMAN WRIGHT: So --MR. EDGE: I'm sorry. 23 VICE CHAIRMAN WRIGHT: -- quick question, on 24 that last slide. 25

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[Reference: PowerPoint Slide 15]

Some of the seminars and things that you go to
-- I think EPRI has been looking and talking,
pushing, developing, whatever, at the utility site,
plant site, or at substations. I mean, there's a
certain amount of power that you use to operate
your substation or operate the power plant itself:
lighting, and you've got line losses and things
like that. There's been a lot of innovation in
things to make it more efficient on the utility
side of things. Is that factored in this at all?

MR. SNIDER: Commissioner Wright, the DSDR is exactly that. It's not ingressing the customer home, it's not voluntary -- as Chris said -- it's at the distribution level.

VICE CHAIRMAN WRIGHT: Right.

MR. SNIDER: At the substations themselves. It's where you have a way to automatically reduce voltage for a temporary period of time to divert megawatts from that time period. It provides a lot of benefit not just in peak-shaving for planning reserves, but if we have instability on the grid and we need to provide megawatts quickly -- normally what we call fast-start reserves, which are operating reserves. Without a program like

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this, you might have to have a peaker up and running, at a very inefficient state, waiting to be ramped up and, really, ready for a contingent This program can displace that peaker, be event. there, using the smart grid technology such that, if you have an event -- and we've seen this this year where we've had events and we've run that program for 14 minutes. Well, that 14 minutes isn't the value of the program; the value of the program was, all day long we didn't have a peaker sitting there running at its worst possible heat rate waiting for that event. We could turn that on, operate it 18 minutes, turn it back off, and be back ready again for the next event. So in addition to planning reserves, you also get operating reserves out of that DSDR program that makes it a very utility-side efficient program.

VICE CHAIRMAN WRIGHT: Okay. I've heard numbers, depending I guess on whether it's transmission or some other unit that -- or part that you operate, that it could be as much as 8 percent that's out there that you could recover or recapture. And I don't know -- I wish I had the paperwork with me, but it's really interesting, the technology that is unveiling, I believe you all are

embracing, and I'm glad to see it, you know, 1 because more and more type things are getting 2 really tight now. And as things like your SEER 3 ratings and things become even more efficient, your 4 opportunity to control those volunteer programs is 5 going to be more impactful to you and could be a 6 problem, so --7 MR. SNIDER: [Nodding head.] 8 CHAIRMAN HOWARD: I've got a question. I 9 really was sort of skeptical about it, but do you 10 have a cost for -- we're talking about percentages, 11 which really I can't relate to. I mean, do you 12 13 have a dollar figure? Is this program cost worth I mean, how much actual dollar savings can you 14 15 see generated by the program versus the cost of the 16 programs? MR. EDGE: Is there specifically a program 17 18 that you're referring to, or the whole portfolio in 19 general? 2.0 CHAIRMAN HOWARD: The whole concept of energy efficiency. All the energy efficiency programs, 2.1 22 you know, approved by us. MR. EDGE: That's a -- to answer the question, 23 yes. When we -- we'll go back to the first slide 24

-- go back for reference. I mean, that's the

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purpose of the economic test, of those four tests.

[Reference: PowerPoint Slide 15]

And so, depending on the view of which you -the perspective with which you sit, as you're running those tests, they could and they couldn't. And let me give you an example. You could take one of these programs -- let's take the Residential Lighting Program for -- I'm not picky. Let's just take an energy efficiency one; I don't mean to pick That is a program that passes the total resource cost test with flying colors, as well as the utility cost test, but fails the rate impact measure. So in both the -- so what that's saying is, from a utility cost test, from a revenue requirement basis, it is more cost-effective for the utility to pursue -- and has been verified -we'll assume, as well, that this has been verified by M&V. It is -- the revenue requirements are lower, from a utility view, to pursue that energy efficiency program versus the supply-side alternatives to serve that energy and capacity. Now, that's from the utility cost test perspective. From the participant test perspective, yes, payback is probably about six months on that program, if they participate on the program. As long as they

turn the light bulbs on, then they're going to see
that energy savings and, as a result, they're going
to see the bill savings that are going to offset
any type of personal investment they had.

So we've taken care of the participant, we've
taken care of the utility as to trying to answer

From a total resource cost perspective -- let me move to the nonparticipant test before I go to the total resource cost, because I told you that's really just a combination of the two. Now the rate impact measure, again, is from the purview -- and the way I always like to think of it -- from the nonparticipant. So Mr. Snider went over and bought himself a dozen CFL bulbs at the Home Depot as a result of our program and installed them all.

that question do the benefits exceed the costs.

MR. SNIDER: I did.

MR. EDGE: But my grandmother didn't. So my grandmother is going to be looking at -- the purpose of that rate impact measure is to look at it from a nonparticipant view. So my grandmother didn't; she likes incandescents, for whatever reason. She's a sweet lady; we won't make any assumptions of why she did or did not participate in it. However, we're looking at it from her

purview. Since she didn't participate in the program, the costs actually exceed the benefits because what's happened is you've reallocated the revenue requirements associated and so she now has no bill savings to offset the revenue requirement reallocation and subsequently her rates have gone up.

CHAIRMAN HOWARD: Right. That was my question.

MR. EDGE: And as a result of her rates going up and that she wasn't a participant, her bills have also gone up. So my poor grandmother now has her bills that have gone up, but his bills have gone down.

So now I'm going to come back and look at it from a societal view. I'm going to put Glen and my grandmother and I'm going to put the whole pool of our other 1.2 million customers together and I'm going to look at it from the total resource cost test. What that's viewing is, on an overall basis, bills went down. But we just recognized that rates go up. So bills have gone down in overall perspective, which means that the benefits, in essence, have exceeded the costs of the program. But depending on whether you participated or didn't

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participate, you could have variances as to whether the benefits exceeded the costs.

CHAIRMAN HOWARD: I guess I'm looking at it, you come in for a rate case. You want cost recovery on an energy efficiency program. What do I see to allow this cost recovery? Where do I see the savings? How do I know, in the generation mix or any kind of generation portfolio, that there's a reduction in there that would justify the cost of this program? I think -- and it's in simple terms. I think of barbeques for communities, I think of the personnel out there, you know, your people out there spending time in the community. You know, the cost of the bulbs. The program is not mandatory, except for industry, I guess. Everybody is paying this additional fee, whatever it is, for the energy efficiency program. Sitting in a rate case when you come to us, how do I know where I stand as economic regulator, in evaluating the program.

MR. SNIDER: I would say, Chairman Howard, from my perspective, to the extent these programs must pass the utility cost test and M&V will verify -- measurement-and-valuation will say -- not only on a forward-looking basis but on a retrospective

basis that these are cost-effective programs, the 1 simplest way of thinking about that is, the cost of 2 the supply-side alternatives that would have had to 3 be built but for these programs would have been 4 more expensive. So the cost-effectiveness tests 5 that are required, to achieve cost recovery, are 6 set up such that it must be cheaper to engage in 7 these programs than the supply-side alternatives, 8 and that you will do M&V after the fact to ensure 9 10 that that is truly the case; and therefore, they are allowable. 11 Now Chris screens out a bunch of programs for 12 13 measures that are not cost-effective. So in this 14 array of DSM and EE programs that he's just shared 15 with you that are in the portfolio, there are five probably for every one, that didn't make it into 16 17 this list because they didn't pass the test that 18 Mr. Edge just spoke about. So as long as they are 19 passing those utility cost and the TRC tests that 2.0 Chris spoke about, I believe that you're on good 2.1 stand to say that this is an allowable expense

CHAIRMAN HOWARD: Okay, thank you.

MR. ANTHONY: Mr. Chairman.

within a rate case type of proceeding.

COMMISSIONER HAMILTON: Let me -- if I could,

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| 1 | let me put this out, Mr. Anthony. This is |
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| 2 | following the question that the Chairman asked. |
| 3 | Let me ask the question another way. You're |
| 4 | involved with North Carolina with mandates for |
| 5 | these programs. At this time you aren't, in South |
| 6 | Carolina. Answer it from the fact that you've got |
| 7 | to do it, instead of it's the right thing to do. |
| 8 | MR. ANTHONY: We don't have any mandates for |
| 9 | DSM/EE in |
| LO | COMMISSIONER HAMILTON: You don't? |
| L1 | MR. ANTHONY: North Carolina. |
| L2 | COMMISSIONER HAMILTON: I thought you had |
| L3 | MR. ANTHONY: Only for renewable generation. |
| L4 | We don't have |
| L5 | COMMISSIONER HAMILTON: Well, renewables |
| L6 | MR. ANTHONY: any mandates for DSM. |
| L7 | COMMISSIONER HAMILATON: are good. We'll |
| L8 | get to the same place. |
| L9 | MR. ANTHONY: The renewable generation has to |
| 20 | compete against the gas and nuclear stuff in |
| 21 | generation, but they're not competing against the |
| 22 | DSM. |
| 23 | COMMISSIONER HAMILTON: Well, I understand |
| 24 | that, but what is the fact on renewables? How much |
| 25 | more expensive are they than the normal generation? |

| 1 | MR. SNIDER: Well, one of the ways to think |
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| 2 | about that is they're the amount above a couple |
| 3 | of points. One is, there is a cost cap, and that |
| 4 | cost cap measures the extent to which renewables |
| 5 | cost more than traditional. So you have a mandate |
| 6 | to have a certain percentage of renewables as part |
| 7 | of your portfolio, but that mandate is subject to a |
| 8 | cost cap. That cost cap is saying "How much more |
| 9 | is the renewable than the traditional resource, and |
| 10 | don't spend more than X on that." That can be seen |
| 11 | in the total cost of the RECs. Now, I don't have |
| 12 | those dollars with me today, but they're clearly |
| 13 | delineated in how much you're paying toward that |
| 14 | cost cap; it's the amount above what we call the |
| 15 | avoided cost, which is the traditional generation |
| 16 | alternative. |
| 17 | COMMISSIONER HAMILTON: So the cap is where |
| 18 | you |
| 19 | MR. SNIDER: Is the amount you could look at |
| 20 | to say, "Here's how much above traditional |
| 21 | generation renewables are costing." |
| 22 | COMMISSIONER HAMILTON: Has the cap turned |
| 23 | into the goal instead of the |
| 24 | MR. SNIDER: It's the lesser of. So you |
| 25 | either first hit your specific volumetric goals as |
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a percent of total retail energy. You do that so long as you don't violate the cost cap. If you can't meet those volumetric goals because of the cost cap, then you stop at the cost cap.

commissioner Hamilton: Well, I just notice -not any particular company, but I've noticed
programs that started and stopped, with a great
deal of money being invested in renewables, and
then walking away from it. This seems like
sometimes we put reaching goals above technology to
find out what's the right way to get to where we
need to be, to see what we should be doing.

MR. SNIDER: I think that's a fair comment, and I believe that's why our caps and our goals are measured as a small percentage, and growing, and subject to the technology proving themselves out. And also -- again, not our renewable expert; we don't have that person with us today. But dealing with them quite a bit, I understand that they will not contract for and start to pay for, from the utility perspective, both, renewable technologies until they're proven out within an RFP process as engineering viable, financially viable, permits are in place. So a lot of times the walk-away's at the peril of the developer and not at the peril of the

Public Service Commission of South Carolina

utility.

program.

MR. ANTHONY: I'd like to throw a little gasoline on the fire to get this debate going a little further, since that's why we're here. On the utility cost test, Mr. Snider said when we look at the cost that the utility avoids from the supply-side perspective, against the cost of the DSM or the EE program -- okay? But then that leads to the debate over, well, what cost -- what is included in each of those pots of cost? Because we look at it from a bare-bones "What would I actually have avoided in direct cost, including required environmental compliance but nothing more?" Then we look at just the costs that we spend on the

COMMISSIONER HAMILTON: Okay, thank you.

There are other points of view out there that foster this debate that we don't include all the costs that we should in those two buckets, and that sort of leads us to why there's not unanimity on what programs should be offered.

And then -- God bless you, Commissioner
Hamilton, on the renewable -- renewable costs are
coming down. Wind and solar, that cost per
megawatt-hour generated is coming down. It is.

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But both of them are intermittent. They only produce when the fuel is available, i.e. wind and gas -- I mean -- solar.

MR. SNIDER: Sun.

MR. ANTHONY: So how do we factor that into a resource planning process so that the lights don't go out when the sun isn't shining or the wind's not blowing? Because we get into this debate over, "Well, wind is now cheap." You know, I think our RFPs for wind power to meet the North Carolina requirement, we are getting some very attractive prices for wind/kilowatt-hour. But we can't dispatch it, you know? It comes when it comes and it doesn't come when it doesn't.

So that's what we're trying to get everybody thinking about and debating, and including the other parties. How do we do that? We don't have anything against solar and wind. We love it.

They're almost zero 0&M and they're all capital.

What a great investment for a utility. But we've got to figure out how to run them so that the lights don't go out when the fuel is not there. So I would beg for these two folks to pontificate upon those issues, and Commissioner Fleming, I'll shut up now.

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COMMISSIONER FLEMING: Well, I was just going 1 to say, that's where innovation comes in, and the 2 storage units are being moved forward on, so that 3 But what I haven't heard today in this 4 equation -- I would prefer the words "clean energy" 5 to "renewables." And we are -- we have committed to 6 nuclear in this State. It is not inexpensive, 7 though. Over the long run, it pays off, but it's 8 very expensive, too, probably one of the most 9 expensive in the beginning. But I think clean 10 energy will pay off long-term, regardless of what 11 type of fuel you use. 12 13 [Brief pause] CHAIRMAN HOWARD: You want to continue? We're 14 15 not going to solve this debate today, I can tell you that right now. We'd be here --16 17 MR. EDGE: When I put together --18 CHAIRMAN HOWARD: -- till 2030, doing that. MR. EDGE: -- this slide -- I didn't 19 2.0 anticipate this slide would create so much 2.1 discussion, but we're certainly encouraged, and that was the objective, as Mr. Anthony shared with 22 you from the beginning. That's one of the primary 23 three objectives, to begin that dialogue, and 24 certainly we won't solve it during this briefing 25

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today.

COMMISSIONER FLEMING: And I just want to -- MR. EDGE: Sure.

things that I haven't -- if you really are giving
-- as a result of the Chairman's question, it's
really -- the message needs to be out there of what
incentive it is to do energy efficiency measures,
as compared to sticking to the traditional way of
doing things. Because you're saying it's cheaper
energy for them, right? Cheaper electricity costs?

MR. EDGE: In that example which I provided you, it's cheaper to Mr. Snider, but what about my grandmother? So again, it's a very complicated equation. From the utility cost test, from the revenue requirement, yes, we just admitted we ran the test, we did the M&V, and it's absolutely, from a revenue requirement basis. But then you get down to the granular policy questions about, you know, who is paying for it, and is there crosssubsidization as a result of operating a program that's voluntary in nature, that may not provide the overall rate reductions. They're very difficult questions you have to deal with.

COMMISSIONER MITCHELL: Yeah, I have a

Then, don't you get then to -- what was 1 question. actually required and what's not, then you're 2 coming back to mandates, right? You're talking 3 about you grandmother. Well, if your grandmother 4 had to do it, she would have done it. Doesn't that 5 part become part of the equation, how much is 6 required, and the changing of the laws is very 7 specific there? If it was a requirement that your 8 grandmother had to do it, well, she'd have saved, 9 too. 10 MR. EDGE: Abso- --11 **COMMISSIONER MITCHELL**: But, is it always 12 13 economically viable to do it? All the years I've

commissioner mitchell: But, is it always economically viable to do it? All the years I've sat over here -- and great, good information to hear that it's coming down. Until now, I don't think that happened. You know, always been my point, people struggling to pay power bills, as we go out and hold hearings, if it isn't economically viable to do -- and if it is economically viable, then mandate it. But if it's not -- you know, that puts us in a most difficult position.

[Reference: PowerPoint Slide 16]

MR. EDGE: Okay. I just want to give you a perspective of -- the, really, point of this slide is it's based on our forecast, based on the

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discussion we've had here today, on our approach to screening, as well as the program activity we have. When we look across the forecast period, we continue to see an increase in the trends associated with cost-effective energy efficiency, according to the screening process which we shared with you. And we see those continued trends throughout the forecasting period.

As we look at the longer aspects of the

As we look at the longer aspects of the forecasting period, we really leveraged, quite frankly, a market potential study that we had conducted back in 2009. And we are currently under the process of a new study, in fact, and it will be available and incorporated in the 2012 IRP. So that will take into account what do we know now as far as program activity, the EISA changes, the optout, the other DOE-impending changes, the marketplace activity. Now we'll have new, fresh information to have for that, that will be reflected in next year's forecast.

VICE CHAIRMAN WRIGHT: When you do this analysis, can you test this against the entire portfolio of programs, or do you do the test against each one individually?

MR. EDGE: We go back to this exact planning

scenario, which I described to you. 1 [Reference: PowerPoint Slide 14] 2 We'll start all over with this universe of 3 measures, and we'll go back through that --4 **VICE CHAIRMAN WRIGHT**: To the beginning. 5 MR. EDGE: -- screening process. And we'll 6 screen them individually on the economic efficiency 7 that Commissioner Mitchell just referred to, and 8 we'll bundle those programs and we'll keep them in 9 force. 10 [Reference: PowerPoint Slide 17] 11 And, as well, this is the reflected demand, or 12 13 peak demand impacts. And I'll launch it over to 14 Mr. Snider here. The note here is that by 2021, we 15 have existing Large Load Curtailment and Voltage Reduction -- by "existing" we mean those efforts, 16 demand-response efforts, that existed prior to the 17 18 launch of our new portfolio, really that that was 19 promulgated back in 2008. So, really, a point here 2.0 is, by 2021, we're anticipating an additional 1,000 megawatts of peak demand reductions as a result of 2.1 22 our new initiatives that we've been bringing before this Commission in the past couple of years. 23 I'll, at this point, transfer it over to Mr. 24

Snider, and he'll tell you what it all means.

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MR. SNIDER: And that was just, you know, as a segue to say, everything I'd spoken about in the load forecast was at the gross level, prior to DSM and EE. So from a planner's perspective, as Chris points out, there's a significant reduction in total megawatts that are needing to be served through traditional supply-side resources as a result of these activities in both the DSM and EE.

And I often get the question of, "Well, you're an over-12,000-megawatt system. How significant is it?" Well, if you look at it from a standpoint of, we're reducing by that 1,000 megawatts Chris spoke about, we're not building, in that timeframe, barely 1,000 megawatts, so it's more than 50 percent of your incremental need. I mean, it's the size of one nuclear plant or a large three-on-one combined cycle. So these are -- that would be a significant power plant that, absent these initiatives, would be built on the supply side of the equation. So if you put it in that light, as opposed to, "Well it's only 8 percent of your total portfolio," as a percent of your net new needs it's a very significant percent, and it's a significant commitment on behalf of the company.

So with that, I thought we would wrap up the

| 1 | two bullets on the demand side of the equation and |
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| 2 | quickly move through some of the factors that are |
| 3 | influencing the supply side. I think we can move |
| 4 | through these rather expeditiously. On the fuel |
| 5 | price side, I think some common themes I know |
| 6 | we've all |
| 7 | CHAIRMAN HOWARD: Mr. Snider, I hate to |
| 8 | interrupt you. |
| 9 | MR. SNIDER: No, please. Please do. |
| 10 | CHAIRMAN HOWARD: But my reporter needs a |
| 11 | short break. Could we have a about a ten-minute |
| 12 | break? |
| 13 | MR. SNIDER: Absolutely. |
| 14 | CHAIRMAN HOWARD: Thank you. |
| 15 | [WHEREUPON, a recess was taken from 11:50 |
| 16 | to 12:00 p.m.] |
| 17 | CHAIRMAN HOWARD: Mr. Snider, I believe you |
| 18 | had the floor when we left? |
| 19 | [Reference: PowerPoint Slide 19] |
| 20 | MR. SNIDER: Thank you, Mr. Chairman. I think |
| 21 | what we're going to do is quickly move through |
| 22 | again, the first two factors we spoke about, our |
| 23 | load forecast, our DSM, our EE, were things that |
| 24 | affect the demand side of the equation in the |
| 25 | planning process, and we had a good debate around |

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those. There are also a couple of trends I'd like to point out around the supply side of the equation, and factors that affect what supply-side resources we are looking at.

Fuel prices is one of the most obvious ones, and so we'll jump right into that.

[Reference: PowerPoint Slide 20]

You know, one of the really good things from a planner's perspective we've been seeing is a reduction in fuel prices. So, in 2009, what I tried to do here was show the cost per megawatt-hour of a generic or a specific natural gas plant, combined-cycle technology, roughly a seven -- what we call -- heat rate, converts the cost per MMBTU into dollar per megawatt-hour, trying to put everything on perhaps a field that people are familiar with, in terms of dollars per megawatt-hour.

So what you can see is the continual decline in the dollars per megawatt-hour to operate a combined-cycle unit. So if you remember back to 2006-2007, you had gas prices that were at least double, if not triple, these levels. Significant decline down to 2009. From 2009, we've seen even further declines. We could probably do an entire

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presentation on that, and I'm going to get into, one second, some of the drivers for it. But one of the things that we're still holding out there -- we look at just the pure cost of the natural gas, but there's still some debate about what happens if you get future carbon legislation. So what I did put on this graph as well is a dotted line that shows what our expectation of the cost to run it would be with a carbon tax imposed, or a carbon price component. And that would raise our current 2011 levels back up and slightly above where they were in 2009. And we'll talk a little bit more about the carbon in the future.

But today we are enjoying a significant decline in natural gas prices: 22 percent over the period, in general. And reductions are not limited to the front end of the curve. I think I told you last year, what we've seen in this recent trend is a long-term reduction in prices. A lot of times you'll see volatility in prices that are limited to what we call spot market, where the price of gas for delivery for today or next week is very volatile; it will go up, it will come down, you'll see declines. But over the entire curve -- and what I mean by that is these are prices that were

projected you could buy at today, so you could buy 2015 gas today for a certain price, and that's what it would cost to run your combined-cycles, so the entire long-run curve has declined significantly, which is a good thing for the consumer.

[Reference: PowerPoint Slide 21]

Again, this is no new story for anyone in the room, I'm sure, but it has to do with the change of supply sources driving this down. If you go back just, you know, four or five years ago and look at what the DOE and the EIA were saying in 2007, you had a decline in conventional production that was largely going to be filled from imports in pipeline and from LNG. And when you consider the transport of LNG and the liquefaction costs, it really gave rise to much more expensive natural gas prices than what we're seeing today, where we think shale gas will fill in that role.

So as you can see -- what's interesting here is LNG has not -- it' moved from not even a discussion anymore, in a very short period of time, to now some of the stuff I'm reading in the industry publications is around the US becoming a net exporter. Really unthinkable just two years ago, that we would become a net exporter of LNG,

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and now that is the discussion being had, is that investments in these facilities are going to turn from net importers to net exporters.

So again, with these underlying fundamentals, we've seen a tremendous reduction in natural gas prices.

[Reference: PowerPoint Slide 22]

Let's compare that to coal prices and what we're seeing in coal prices. Again, in the long run, while the long end of the curve is seeing a reduction in prices, what's really interesting is what's happening in the short run. And again, so unlike gas, coal is far less transparent in the longer portion of the curve. It's much more difficult to get an accurate price quote, so these are largely forecasts in the long run: BENTEK's forecast or EIA forecast, et cetera. They're forecasting that as demand declines for coal, you will see a price reduction. However, given all the activity happening in the short run to make coal more expensive -- the cost to transport it, the cost to mine it, the cost to burn it -- you've seen increases. So if you look at 2009 -- that's the green line, '10 is the blue, and '11 is the red -over the next 2012-15 period, you're actually

seeing an increase in coal prices. And then, if you put carbon on top of that, like we did with natural gas, you can see it's a dramatic increase. Just by way of comparison, a natural gas combined-cycle has about, on a per megawatt-hour basis, about 40, 45 percent of the carbon footprint of coal. So the price impact of carbon on a coal plant is about double that of what it will be on a natural gas plant, so if you get \$20 a megawatt-hour impact on the combined-cycle, it would be a \$40 impact on a coal plant.

[Reference: PowerPoint Slide 23]

So if we put the two together on the same axis and say, "What's been happening," in 2009, coal was clearly cheaper over the near-term horizon than natural gas, so you would dispatch coal right after nuclear plants and natural gas would clearly come -- whether combined cycle or simple cycle -- following the coal plants. And you can see it's a pretty good margin by which coal was cheaper than natural gas. But if I fast-forward that to today, or at least for our 2011 IRP, what we're seeing is not only has that gap closed, but it's flipped. So right now, for the next four years, the projection is that natural gas will be significantly more

| 1 | cost-effective than coal, and this is even without |
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| 2 | a carbon tax. So a carbon tax would just further |
| 3 | exacerbate this already advantaged natural gas. So |
| 4 | that's a pretty dramatic shift in the cost of the |
| 5 | competing fuel types in just a two-year period. |
| 6 | [Reference: PowerPoint Slide 24] |
| 7 | So, I'm going to and let me, before I move |
| 8 | off of this slide and on to environmental, follow |
| 9 | up by saying this was all based on our 2011 IRP, |
| 10 | which was data from the spring of this year. If I |
| 11 | were to redraw that slide with today's data, that |
| 12 | graph has been further exacerbated, and the |
| 13 | advantage gas has over coal as we sit here today is |
| 14 | even more dramatic than what I just showed on that |
| 15 | graph. |
| 16 | So I'll move on, unless there are any |
| 17 | questions on the fuel side, to the environmental |
| 18 | landscape, trends in the environmental landscape. |
| 19 | [Reference: PowerPoint Slide 25] |
| 20 | So this is a pretty busy graph, but it does |
| 21 | give a good picture of what we are facing in |
| 22 | planning space on the environmental front. If you |
| 23 | look at the top and this is strictly around |
| 24 | emissions, so this is just air emissions. The top |
| 25 | part of the graph is Federal legislation, the |

1 history of it, how it's evolved. The bottom part has been our compliance with North Carolina Clean 2 Smokestacks. So if you think of the bottom part, 3 that has led to us scrubbing a large number of our 4 larger, newer, more efficient coal plants, and it 5 really has well positioned us to be ready for 6 Federal legislation on the top part of the graph. 7 And here, some of the more recent ones that are in 8 the news that are being talked about a lot is the 9 CSAPR, or the Cross-State Air Pollution Rule; 10 that's an evolution of CAIR-2, which was remanded 11 to the Courts, which became the Transport Rule, 12 13 which then became CSAPR, which is dyslexic for the 14 Cross-State Air Pollution Rule. So, trying to keep 15 track of all that has been a joy for us planners. 16 But the long and the short of CSAPER is 17 basically a pretty stringent reduction in the output of all SOx and NOx -- and we'll go into that 18 19 in the next slide -- whereas CAMR, which never did 2.0 make it into implementation -- that's why it's crossed out there -- has evolved into MACT, and 2.1 22 that's the regulation of mercury and heavy metals and hydrogen chlorides. 23 24

The final Rule is expected in a couple of weeks. I believe December 16th is the targeted

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release for the final Rule on MACT.

2 [Reference: PowerPoint Slide 26]

So, real quickly to review on CSAPER. know, CSAPER has divided the country into multiple states and placed them in different groups. North Carolina is in -- a Group 1 state, and that's in with Virginia, West Virginia, Tennessee, in this region, and then a bunch of the Midwest states are also in Group 1. South Carolina is in Group 2, along with Georgia, Alabama, in this area, and then Texas, Nebraska, Kansas, and Minnesota. necessarily geographically all together, but I think it has to do with how densely populated, where the states reside relative to one another, how the cross-state pollution -- so, where -- are you on the coast, are you an island, are you not, are you in the middle of a bunch of other states? Such as North Carolina and TVA are together, and how their pollution in Tennessee will affect North Carolina, so they're grouped together. And why that's important is how you can comply. There's no allowance trading between the groups, so you have to trade within your groups. And most importantly, you have to stay within the state limits.

So a lot of that right now for SOx and NOx 1 trading, the Rule is very new and I know there's a 2 lot of debate. Commissioner Wright, I know you've 3 addressed some of this very recently, in terms of 4 what are the ultimate impacts going to be of 5 utilities having to shut down coal units in order to comply with this, and what does that do to 7 reliability in the area. And fortunately for North 8 Carolina/South Carolina, we are well positioned 9 from a reliability perspective. It's -- the cost 10 might be another issue, but because of the 11 investment in controls that we've made, because of 12 13 the retirements that we have planned, and 14 converting over to natural gas, even though the Federal statutes are much more stringent than the 15 16 state statutes, we'll be well positioned to meet our SOx and NOx limitations, from the utility's 17 18 perspective. It does, though, have an implication for the 19 2.0 remainder of our non-scrubbed coal units. And one 2.1 of the things we'll talk about later in the 22 presentation is the timing of our retirements and what it does to our thinking around the timing and 23 the retirements of the rest of our non-scrubbed 24 units. And then also as we retire units, just that 25

1 final bullet there, to point out that as you get allocated credits, those credits are really six 2 years. The two years says, "Okay, you're fully 3 retired," so you haven't run for two years; and 4 then after the fully-retired you get four 5 additional years of credits, but then those credits 6 go away in terms of being allocated to you. 7 So that's a brief overview of CSAPER, SO_2 , NOx. 8 Stringent limitations, more stringent than the 9 North Carolina limits that were placed under Clean 10 Smokestacks. But because of our scrubber 11 activities and our retirement activities, we will 12 13 be well-positioned for that. 14 [Reference: PowerPoint Slide 27] 15 MACT, also a pending -- as we pointed out, the 16 Rule is due out anytime here in the next couple of 17 weeks. It's geared towards measuring -- really mercury is the big one, along with some of the 18 other heavy metals. And SO_2 , that bottom bullet, 19 can be used as a -- because it's easier to measure 2.0 2.1 -- as a surrogate for some of the hydrochlorides. 22 What we're looking at with MACT, and some of the things that have us concerned with MACT really 23 is --24

[Reference: PowerPoint Slide 28]

-- on our controlled facilities at Asheville,
Mayo, and Roxboro, is really experience with our
CEMS data -- our continuous emissions monitoring -to see whether additional controls will be needed
at those facilities. Our scrubbers, our flue-gas
desulfurization -- gets you a lot of the mercury,
but is it enough. And until we get some CEMS data
coming in, we're not sure yet whether or not we'll
be able to comply fully with MACT, depending on how
the final Rule comes out.

This gets -- the EPA is taking us really to what's a new level, in that you're talking parts per trillion now, and that is just an infinitesimally small amount of output that they're expecting you to -- you know, they're really taking it to the -- as I talk to our folks in Environmental and our power plant operations group, the regulations are on the verge of the technology. So you're barely able to measure, at those finite levels, and so compliance means measuring, you know, an infinitesimally small amount of mercury and making sure that you're compliant. You know, hopefully, our existing controls will be enough, but if not, where we're going is -- you know, you've heard of fabric filters or baghouses, or

1 activated carbon injection. Those are further controls that could even further reduce mercury 2 But this is where I talk about cost. At 3 some point, that will be a cost, if we have to go 4 to that, that the ratepayers would bear, to get to 5 that really last level of mercury removal. And so 6 it's something we're closely keeping an eye on. 7 With all that said, Robinson, here in South 8 Carolina, is not yet controlled, so we're looking 9 at three really potential outcomes for that, which 10 would be to put full controls on it; to convert it 11 to natural gas, and change its boiler, and what we 12 13 mean here is not a retirement and building a gas 14 unit but actually changing the boiler from a coal 15 boiler to a natural gas boiler; or a retirement of 16 that unit. So that study is underway. We're 17 looking at those three alternatives. I will tell 18 you it's unlikely, for a unit of that age and its 19 size, that it would be economic to put the controls 2.0 So it's quickly coming down to, do we convert 2.1 that unit back to natural gas or do we retire that 22 unit, to be compliant with future Federal regulations. 23 [Reference: PowerPoint Slide 29] 24 So once we've done all this, what are the 25

| 1 | results? 2007 we were already scrubbed so this |
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| 1 | results? 2007, we were already scrubbed, so this |
| 2 | is just the results of the retirements and putting |
| 3 | in the natural gas units in their place. And you |
| 4 | can see the significant reduction that we have |
| 5 | achieved and expect to achieve in SO_2 . I guess |
| 6 | what's of note here, this slide I prepared with |
| 7 | data that was readily available to me. If I were |
| 8 | to go back to pre-controls of 2002 so we're just |
| 9 | talking one decade the reduction that we will |
| 10 | achieve in one decade is effectively 95 percent |
| 11 | reduction in SO_2 . So we are going to be, in one |
| 12 | decade's time, putting out 5 percent of the SO_2 we |
| 13 | did just one decade earlier. I think that's a |
| 14 | tremendous reduction in SO_2 , and often one that we |
| 15 | don't do a good enough job of taking credit for or |
| 16 | advertising in the environmental space. |
| 17 | Same type of picture on the NOx side. |
| 18 | Significant reduction in NOx. Same comment. If I |
| 19 | went back to 2002, we are probably at somewhere |
| 20 | around a 20 percent output of NOx, so one-fifth the |
| 21 | NOx output from a decade ago. |
| 22 | COMMISSIONER FLEMING: Could I just quickly |
| 23 | ask, how does that compare with other companies |
| 24 | across the country? |

MR. SNIDER: That's a great question, and it

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compares very favorably. Again, because of the 1 legislation in North Carolina, we've started 2 addressing this issue and looking at that in 3 concert with what we saw coming on the Federal 4 landscape. So it wasn't just North Carolina Clean 5 Smokestacks, but that with pending MACT, pending --6 at the time -- CAIR-2/Transport Rule/CSAPER, the 7 culmination of that led to the combined strategy of 8 controls plus retirements that has put us in what I 9 believe is in front of the country. So very few 10 utilities countrywide have been as aggressive over 11 this last decade as the Carolina utilities have 12 13 been in reducing their environmental footprint, and hence, they're scrambling, relatively speaking, 14 15 compared to the Carolinas, in terms of their ability to respond to both CSAPER and MACT. 16 17 So I don't have the exact numbers, but when 18 you start reading the literature around ADP, ERCOT and the Texas utilities, some of the Midwest 19 2.0 utilities, Illinois Basin type utilities, they 2.1 don't have the type of controls in place and the 22 plan for retirements and replacement with natural

COMMISSIONER FLEMING: And since some of our investor-owned utilities have other states involved

gas that we have here in the Carolinas.

| 1 | that aren't directly North Carolina and South |
|----|---|
| 2 | Carolina, have they been doing the same planning |
| 3 | and forward-thinking with their utilities? Or do |
| 4 | you know that? |
| 5 | MR. SNIDER: I can't give you specific answer |
| 6 | on that. I think they're planning relative to |
| 7 | their state and Federal jurisdiction. |
| 8 | COMMISSIONER FLEMING: Okay, so it may vary. |
| 9 | MR. SNIDER: It may vary by jurisdiction, and |
| 10 | they may be behind, not because it was imprudent to |
| 11 | be behind but they didn't have the state or |
| 12 | pressing Federal regulation at the time that we had |
| 13 | to get us moving faster. |
| 14 | COMMISSIONER FLEMING: Okay. Thank you. |
| 15 | VICE CHAIRMAN WRIGHT: A quick follow-up to |
| 16 | Commissioner Fleming's question. You mentioned |
| 17 | I mean, I know you're ahead of the curve. It's |
| 18 | pretty obvious. But you did mention that, because |
| 19 | you don't really know what the final Rule's going |
| 20 | to say, you're not sure whether there will be |
| 21 | additional things you have to do or if you needed |
| 22 | to add something in order to comply. Other I've |
| 23 | heard, obviously, as recently as yesterday, that |
| 24 | other utilities are having that problem where |
| 25 | they're having to choose which rules not to comply |
| | |

with. 1 MR. SNIDER: Absolutely. 2 VICE CHAIRMAN WRIGHT: I don't think that --3 from what I'm hearing you say, Progress doesn't 4 have that situation. 5 MR. SNIDER: No. Clearly, with CSAPER, we feel we're in a good position, both because of our 7 controls activity and our retirements, that we are 8 on a good slope to comply with CSAPER and the SO₂ 9 and NOx reduction. I'm not quite as confident on 10 the mercury until we start seeing some of this 11 continuous emissions monitoring data come in, 12 13 whether or not we'll need to install and how 14 quickly we'll need to install additional controls 15 around mercury, if needed. 16 So I'm very confident on CSAPER, a little less confident around MACT. But the compliance period 17 18 for MACT is further out, so while the Rule is 19 coming out, it's a 2015 compliance; it would give 2.0 you time to comply. 2.1 I think for a lot of utilities, the problem with CSAPER is it's a -- as I understand it --22 three-, four-, five-year period to design, 23 engineer, flue-gas desulfurization -- or scrubbers, 24

as they are known in the industry -- and yet the

compliance period initially was 2012 with, now, a softening of it with penalties being pushed back to '14, and still continued discussion around exceptions to the Rule and whether or not they'll be granted to allow that. Because your only other option is to not dispatch, or retire.

VICE CHAIRMAN WRIGHT: And do you use your own engineers and labor to do the retrofits if you have to do that, or do you have to bid that out?

MR. SNIDER: Combination of both.

VICE CHAIRMAN WRIGHT: Combination?

MR. SNIDER: So again, let's leave emissions with -- you know, it really is, from a planner's perspective, I look at this and I say, you know, significant reductions, but at an expanse. You know, these control technologies do not come for free. These gas plants are not coming for free. There are -- the benefit of that is you're reaping the fruits of this, are -- you know, we are now able to take advantage of the low-cost gas we just spoke about; we are having an environmental footprint that is a fraction of what it was just a decade ago. But the question really becomes how much further do you need to go, pending these rules.

And what I didn't put on here, and there will 1 probably be discussion next year or even before, 2 is, beyond emissions, we didn't speak about some of 3 the groundwater or intake water -- 316(a), 316(b) 4 type of discussions that are going to come out next 5 year, that talk about fish impingement and 6 entrainment -- I'm learning more about that than I 7 ever cared to or wanted to know -- and what the 8 potential mitigation cost/time may be for those in 9 terms of our once-through cooling plants, and the 10 potential to modify intake structures or even go to 11 closed-loop cooling and cooling towers. 12 So that 13 will be a discussion that I'm sure will be in front of this Commission, as well. 14 15 **VICE CHAIRMAN WRIGHT**: Just one other question Tell me about -- let's talk about coal ash 16 17 for a second. It doesn't appear like, from what 18 I'm seeing, it's going to be a hazardous waste. Ιt 19 looks like it's going to be more a special waste or 2.0 something like that. How does that -- but it does take out of play some uses, still, I think for 2.1 Is that true? 22 concrete. 23 MR. SNIDER: I think the question is still I know our environmental folks and our coal 24 combustion folks are looking closely at that. 25

| 1 | don't think there's been a definitive determination |
|----|---|
| 2 | whether beneficial reuse is totally out of play |
| 3 | yet, or not. I know that the fact that it's not |
| 4 | hazardous was the biggest hurdle, because of the |
| 5 | costs associated with classifying that as |
| 6 | hazardous. |
| 7 | VICE CHAIRMAN WRIGHT: Huge. |
| 8 | MR. SNIDER: It's huge. If there's still |
| 9 | the inability to use this for beneficial reuse will |
| 10 | still present some costs. So my recent |
| 11 | understanding is that is not definitive. |
| 12 | VICE CHAIRMAN WRIGHT: The jury is still out |
| 13 | on that part. |
| 14 | MR. SNIDER: Yeah, jury's still out. |
| 15 | [Reference: PowerPoint Slide 30] |
| 16 | Okay. So what are the planning results? We |
| 17 | talked about supply-side issues, demand-side |
| 18 | issues, how we run our planning process. You know, |
| 19 | what comes out of this whole process? |
| 20 | [Reference: PowerPoint Slide 31] |
| 21 | This is another very busy graph, but if we |
| 22 | break it down in pieces I think it's very similar |
| 23 | to last year's plan and I'll try to highlight some |
| 24 | of the differences. |
| 25 | So if you just focus for a moment maybe on |

1 2012 through 2015. The blue lines going up are additions, the red and black lines -- green ones --2 going down are removals or retirements from the 3 So, just how we're looking at this, the red 4 going down is the retirement of our North Carolina 5 unscrubbed coal, so that represents about 1,500 6 megawatts of some of our smaller, older units where 7 the economics were not justified to put all these 8 controls on the units. So in their place are the 9 two large blue lines going up; that's our three-on-10 one Lee combined-cycle facility and our two-on-one 11 Sutton facility. So in total, you're looking at 12 13 over 1,500 -- right at 1,500 megawatts of natural 14 gas combined-cycle that's being built in its place. What's different from last year is the 15 acceleration on the retirement of the coal units, 16 and that's multifactor. We talked about all the 17 factors driving us to accelerate that. Load has 18 gone down, for one. So the need for the plants has 19 diminished. The cost of the alternative natural 2.0 2.1 gas has become much cheaper, so the benefit from a 22 fuel perspective of having these older coal plants 23 on the system have diminished dramatically. With CSAPER coming in, the cost to run an 24 unscrubbed unit, in terms of paying an SO_2 allowance 25

1 or, conversely, being able to sell that and then return that through the fuel clause to the 2 customer, adds to the cost of running an unscrubbed 3 So with all of those factors converging, 4 unit. we've accelerated the retirements of some of our 5 unscrubbed coal in North Carolina. And we're still 6 on track with the building of our new combined-7 cycles. 8 COMMISSIONER HALL: Mr. Snider --9 MR. SNIDER: Yes, Commissioner Hall. 10 **COMMISSIONER HALL**: -- tell me, what happens 11 to the employees at the retired plants? Will they 12 13 move to other plants? Are they trained for that, or how does that work? 14 15 MR. SNIDER: That's a good question, and there was an extensive effort -- I was involved in some 16 of the discussions -- just happened to be in the 17 room where they were discussing it -- to cross-18 19 train and redeploy as many employees as possible. 2.0 Frankly, there are fewer employees at a combinedcycle plant than a coal plant. You don't have all 2.1 22 the fuel-handling employees and so forth. -- I wish I had brought the statistic with me. A 23 fairly large number of the employees were 24 redeployed throughout the company, either at the 25

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1 new plant, on traveling crews to perform maintenance on our existing plants, and I know the remainder were offered our voluntary severance package that's going out as a result of the Duke 4 and Progress merger. So a large number, as I understand it, have been able to find employment elsewhere in the company. 7 **COMMISSIONER HALL:** Okay. MR. SNIDER: So that's sort of the near-term activities. When I look at our plan, I tend to 10

think of that front part as more the certain portion of the plan. Those blue bars represent steel in the ground. I've been out to view those plants. They're well on their way under construction; there's turbines on site, we've signed contracts, there's gas supply. There's determined retirement dates for these plants.

When you go beyond that, it goes from being a certain thing to a forecasted. So what we're forecasting now, compared to last year, in this remaining part of the decade is fewer gas-fired plants needed as a result of our reduced load forecast, and as well as our DSM activities, as we spoke about, displacing an entire plant. So we have less need for natural-gas-fired facilities as

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I sit here today than we did a year ago.

We also continue to support the concept in this plan of regional nuclear, and we'll get into the rationale for that a little later. You know, a few years ago we were leaning more towards selfbuilt large-frame nuclear. We've transitioned to believing that smaller blocks of shared nuclear is more cost-effective for our customers, and they continue to be in our plan, in our 2011 IRP.

The remainder of the plan is built by the addition of simple-cycle and combined-cycle CTs.

Now I will point out that what you see in the 2021 timeframe, those are purchases that go away. We have purchases from Calpine at our Broad River facility. That's when the contracts run out. So as we go through time, because I don't have contractual rights to those, as a planner, I plan -- put in the plan -- replacement for that. It yet remains to be seen whether, over the next several years, we re-contract for that and some of those blue bars go away and are replaced by a renewed contract with our Broad River facility. So this is still a forecast when you get out that far in the plan. The way I treat it as a planner is, unless I have a commercial contract that is signed, I have

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1 to be cautious and assume that I won't have rights to those resources, and so we put replacement units 2 in the plan. The economics and the physical 3 condition of those plants, everything, will bear 4 out over the next several years. And so that is 5 subject to change. 6 So this plan looks very similar to last year's 7 plan. A couple of differences, again: 8 acceleration of retirements, a few less simple-9 cycle gas units in the plan, but the look and feel 10 of the plan is generally the same. So that --11 COMMISSIONER MITCHELL: Let me ask you a 12 13 question there. You were talking about nuclear and the regional. What's your definition of 14 15 "regional"? Has that broadened out, or is that the same as it's always been? Are you looking at a 16 17 larger scope or what? 18 MR. SNIDER: Well, I do think, you know, 19 there's two perspectives. From a pure economic 2.0 planning perspective, I'm -- as Len used the term 2.1 -- fairly agnostic. I have a generic cost that we 22 believe to be representative of the cost of nuclear for regional participation. We put that in and we 23

supported.

still believe that those macroeconomics are

On the commercial side of the business,

there are discussions going on within the region, 1 that I'm not part and parcel to, where at some 2 point they will go from being generic units to 3 specific units, once the commercial terms are 4 reached. At this point, I believe that, you know, 5 there are only a finite number of nuclear plants in 6 our region, and all of which are viable candidates 7 to fill that block, if you will. 8 COMMISSIONER MITCHELL: Thank you. 9 **COMMISSIONER HAMILTON**: It looks like you're 10 going to reduce your coal fleet in half? 11 Approximately that? 12 13 MR. SNIDER: Actually we'll still have over 3,000 megawatts of coal. We are retiring about 14 15 1,500. So I'm going to show you that on the next slide, so that's a great segue for me, Commissioner 16 17 Hamilton. I appreciate that. 18 [Reference: PowerPoint Slide 32] 19 So on the capacity mix -- to your question --2.0 in 2009, nuclear -- and, again, this is installed capacity, this isn't energy. This isn't how much 2.1 22 they're running; this is just named, summer rating capacity, what do we have in the fleet as of 2009. 23 I picked a couple years back because I wanted to 24

show it before we brought our Richmond combined-

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cycle on. Once we complete the retirement of the 1,500 megawatts of coal, replace it with the gas combined-cycles, you end up with the capacity mix that's shown on the 2014 pie chart. And if you think about that, it looks pretty visually appealing. You've got nice even blocks of nuclear, coal, combined-cycle, and CT technology. Whereas in 2009, you only have 4 percent of combined-cycle But what does that mean when it comes technology. to energy space? Well, our base-case energy assumption is, we're going to go from being an all coal and nuclear utility where we get about half and half, with just, you know, less than 5 percent coming from anything other than nuclear and coal, and in five short years, from an energy perspective, we're going to transition to, still nuclear, because it's going to run base-load under either scenario being about half of our energy, but we're going to be much more evenly distributed between coal and natural gas as our fuel resources for the other half of our energy consumption, and -- go ahead.

VICE CHAIRMAN WRIGHT: I have a question about
-- you see the number jump for the nuclear wedge.
Now, is that because load is down? Are your

| 1 | shifting things around? Where is the nuclear |
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| 2 | coming from? |
| 3 | MR. SNIDER: No, I'm actually saying that |
| 4 | nuclear will continue to provide the same amount of |
| 5 | energy under either |
| 6 | VICE CHAIRMAN WRIGHT: All right. |
| 7 | MR. SNIDER: scenario. |
| 8 | VICE CHAIRMAN WRIGHT: All right. |
| 9 | MR. SNIDER: I'm sorry if I misspoke. |
| 10 | VICE CHAIRMAN WRIGHT: I may have missed |
| 11 | something, or I didn't hear you right. |
| 12 | MR. SNIDER: Because nuclear is base-load and |
| 13 | is going to run absent fuel outages or any |
| 14 | unexpected outages you know, we're going to run |
| 15 | that base-load either way. The difference really |
| 16 | comes in how do you fill your dispatch above the |
| 17 | nuclear dispatch. |
| 18 | VICE CHAIRMAN WRIGHT: Right, I got you. |
| 19 | MR. SNIDER: And so, before, you know, for the |
| 20 | history of most of our careers, we've been only |
| 21 | coal and nuclear as the vast, vast majority. This |
| 22 | is a rather dramatic change in a short period of |
| 23 | time where, in our base-case assumption, we are now |
| 24 | up to actually coal is behind natural gas. But |
| 25 | what I wanted to show you on the next slide real |

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quickly is -- this is just our base case, and it's subject to fuel price volatility.

[Reference: PowerPoint Slide 33]

So while the capacity mix, as we pointed out, is pretty much set in stone -- these plants will be built; this is what our capacity portfolio will look like -- we can go a couple of different ways on how we dispatch these plants. So you have multiple future states on how you might possibly operate your facilities.

In one future state, you're dispatching, you know, gas in a much more -- so the combined-cycles may run 30 percent with coal only running 20 percent. Or you could flip that and you could have coal running 40 percent and only have your gas running 10 percent. So it's really dependent on the price signals you receive as to how you're going to operate the fleet.

So what does that all mean? That's a lot of words, but what that really means is a benefit to the ratepayer. Because you now have a -- because of the capacity mix on the left, you now have a balanced portfolio that is capable of responding to and minimizing fuel costs, and probably even as important as minimizing, stabilizing the total fuel

bill for the customer in a manner that you weren't 1 capable of responding to in the past. 2 So, you know, people ask, "Well, shoot, why 3 don't you go all gas? I mean, this is great. Look 4 how cheap that gas is." And I quickly throw this 5 one last slide up in front of them that says --6 [Reference: PowerPoint Slide 34] 7 -- that's the history of gas prices. So I'm 8 not ready, as a planner, to put all my eggs in that 9 basket. Gas prices, you know, as sure as they were 10 up at \$12, \$13, \$14, and no one -- believe me, no 11 one I knew in the industry could envision today 12 13 where gas could be \$3 or \$4 again. Now it's almost 14 like no one can envision the day when gas is going 15 to be \$9 or \$10 again. Well, if you start thinking about what EPA has done on the coal side of the 16 17 equation, once they get their hands on fracking, 18 they may decide that fracking is not such a good 19 idea, or impose regulations that drive those costs 2.0 up. We spoke about the potential to export; that's not baked into the cost of future natural gas. 2.1 22 That could add upward pressure to gas prices, if we become a net exporter of natural gas. 23 So having the balance to be able to go back to 24 that 3,500 megawatts of coal and run that right 25

after the nuclear plant, should gas prices 1 increase, or conversely if they don't, run the gas 2 and then use the coal for intermediate, is a nice 3 position to be in, for the benefit of the 4 ratepayers. 5 [Reference: PowerPoint Slide 35] 6 So in summary, if I just try and wrap this all 7 up, economic conditions obviously continue to weigh 8 on us. We certainly hoped that we would be in a 9 different position, a year ago when I was here 10 speaking to you, than we are today. We're still 11 waiting to see -- I didn't check at lunch to see if 12 13 the Europeans were happy or sad, but it seems to drive us dramatically, lately. So we'll see -- you 14 15 know, we're prepared to respond to that. Chris's DSM, one of the benefits we didn't 16 talk about in the DSM and EE is it's much more 17 18 flexible to ramp up your DSM and EE efforts in a 19 timely fashion than it is to build a 1,000 megawatt 2.0 plant. So he has a lot of flexibility in 2.1 responding to these economic conditions. And 22 that's the point I was raising in the second bullet here. 23 So, spoke a little bit on the environmental 24 Again, I think, from a compliance 25 front.

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perspective and reliability perspective, we're in good shape. Our past efforts in scrubbing our units, controlling our units, and retiring our units have us well-positioned for air emissions.

Costs, on the other hand, will remain to be seen, if further controls are needed under MACT. And certainly, we've left off of the discussion, as I said 316(b), which has a wide range of possible outcomes, especially on the cost side of the equation, that could drive costs depending on where EPA takes the 316(b) discussion.

The declines in natural gas prices, we spoke about not only change the dispatch order and give you flexibility in that dispatch order, but it did also contribute to the accelerated retirement of some of our coal units.

And then finally, regional nuclear still continues to be in our portfolio because of a couple of the factors we showed throughout this presentation, which is that past volatility in gas prices. There's no reason to believe that couldn't be persistent going forward, and there's still an uncertainty around carbon. So if someone told me today as a planner, "I'll guarantee you \$4 gas and I'll guarantee you carbon never comes into

fruition," I would probably remove nuclear from our 1 resource plan. I don't see that happening, and no 2 one's in a position to make me that guarantee, and 3 so our selected plan still has a place of nuclear 4 in our plan. 5 So with that, I will conclude my prepared 6 remarks and leave it open to any final questions. 7 CHAIRMAN HOWARD: Commissioners, questions of 8 Mr. Snider or Mr. Edge. Commissioner Whitfield. 9 **COMMISSIONER WHITFIELD**: Thank you, Mr. 10 Chairman. Up to now, I've been silent, but Mr. 11 Snider and Mr. Edge have had a good presentation, 12 13 and I thank you for that. My fellow Commissioners know how I like to be silent, so I think I'll break 14 15 that mold right now, but I'll try not to be too long-winded, though. But I do have a few 16 questions. Back to your DSM/EE portfolio slide, 17 slide 15, I believe? 18 19 [Reference: PowerPoint Slide 15] Yes. To go back to maybe a little bit of an 2.0 2.1 exchange Commissioner Mitchell had with Mr. Edge, 22 where we were talking about the different programs that are approved in that DSM/EE rider. Of course, 23 he mentioned there's no mandate, like you used the 24 example of your grandmother, and you mentioned 25

| 1 | there's no, of course, no legal mandate. But, |
|----|---|
| 2 | effectively, when we approve these DSM and EE |
| 3 | riders of course, other states I think say |
| 4 | when I'm at NARUC they say trackers, but we call |
| 5 | them riders that is an economic mandate, and |
| 6 | whether they choose to do it or not, the |
| 7 | opportunity is out there. I don't know how good we |
| 8 | do of letting people obviously, when you get in |
| 9 | a community, you're in an aggressive situation with |
| 10 | the neighborhoods; you are canvassing and doing |
| 11 | that. I guess my question to you, Mr. Snider, is |
| 12 | really what your I'm going from the customer |
| 13 | side now back to the supply side, to the company. |
| 14 | One of your last bullets in your summary was really |
| 15 | in your eyes, on the supply side, really you're |
| 16 | looking at not having to build that other unit. |
| 17 | And I think you tossed a number out; I don't |
| 18 | remember what it was. But that's what the company |
| 19 | is looking at, is what's not built, or what's the |
| 20 | avoided cost, if you will, there. |
| 21 | MR. SNIDER: Yes, that's correct. And so I |
| 22 | think we threw out a number, depending on how you |
| 23 | look at existing versus new, of, you know, 1,000 |
| | |
| 24 | incremental megawatts of DSM and EE. And so that |
| 25 | reduces the need for 1,000 megawatts of generation. |

| 1 | Now, I don't know today I don't have the |
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| 2 | information in front of me to say is that a |
| 3 | combined-cycle, is that a simple-cycle. But I can |
| 4 | give you, you know, just a rough if I'm looking |
| 5 | at 600 a kW, 1,000 a kW, that's between \$600 |
| 6 | million to \$1 billion of capital investment that |
| 7 | will not be made as a result of these EE programs. |
| 8 | Now, I hesitate to say that because you cannot just |
| 9 | take as much as it's tempting to, you cannot |
| 10 | just take that number and say, "Well, good, that's |
| 11 | how much I can spend on DSM and EE." |
| 12 | COMMISSIONER WHITFIELD: What was that again, |
| 13 | \$600 million |
| 14 | MR. SNIDER: To \$1 billion |
| 15 | COMMISSIONER WHITFIELD: to \$1 billion? |
| 16 | MR. SNIDER: of capital investment. That |
| 17 | doesn't include fuel, doesn't include pipeline, |
| 18 | doesn't include 0&M cost, doesn't take into account |
| 19 | whether or not the load shape that was needed. So |
| 20 | there's a lot of factors that go into that complex |
| 21 | equation that Chris mentioned earlier Mr. Edge |
| 22 | and so I don't want to leave you with it's that |
| 23 | simple of a comparison. But for order of |
| 24 | magnitude, I think it's enlightening to say without |
| 25 | these types of initiatives, this is the type of |

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capital investment that, but for those initiatives, would otherwise be made. So I'll leave it at that and then just caution the Commission not to take that in terms of any type of cost-effectiveness or compare that number to any DSM expenditures and try and draw any conclusions.

COMMISSIONER WHITFIELD: Thank you for that

commissioner WHITFIELD: Thank you for that answer. Now that you're talking about cost, on slide 28 you had a little bit of an exchange with Commissioner Wright about --

[Reference: PowerPoint Slide 28]

-- the possible controls that might have to be added. And I'm not talking about the Robinson unit; I'm talking about the units at the top, possible additional controls. Obviously, Robinson, you're going to have to decide whether to convert that to a natural gas boiler or make some other decisions. But on top up there, you don't know -- I think you told Commissioner Wright you don't know how -- in fact, the technology won't even measure the small increments of the mercury and some of these other pollutants yet, so you don't really know what you're going to have to do there. And so, naturally, back to cost, you don't have a grasp on that, or any type of ballpark either, do you?

MR. SNIDER: Well, not at this point, in terms 1 of exact cost. Now we do know what a baghouse, or 2 fabric filters, what activated carbon, what some of 3 the potential costs would be -- and there's a 4 pretty broad range depending on -- again, the Rule 5 on MACT won't be finalized for a couple of weeks 6 here, and then more importantly, we'll have to get 7 continuous emission monitoring performed on those 8 units to see where we stand versus that final Rule, 9 to make a determination of what's the cost-10 effective way to comply with the Rule, should there 11 be incremental investment needed. 12 13 So, yes, to your point, Commissioner 14 Whitfield, there is a broad range. And again, 15 that's just from an emissions point of view. And 16 probably an even broader range, again, as we go into next year, looking at 316(b) and what's 17 18 required from a water intake perspective. So there 19 is a lot coming down from the EPA right now, but 2.0 from reliability and cost, there's a lot of 2.1 uncertainty in the planning space across the 22 country. COMMISSIONER WHITFIELD: With the acceleration 23 on coal plant retirements that you've talked about, 24 does adequate infrastructure exist to support

getting natural gas from suppliers to planned new generation facilities? And I want you, if you could, to address both conventional and natural gas supplies, and the new shale gas supplies.

MR. SNIDER: Yes, Commissioner, there is adequate supplies. One of the biggest pieces of that equation is making sure you have inter- and intrastate pipeline agreements in place to move gas from various supply regions to the demand point. Those pipeline agreements, both inter- and intrastate, are executed and those projects required to deliver gas are on schedule.

COMMISSIONER WHITFIELD: Also, I think this has come up in a previous ex parte with Progress, but with another year of experience and discussion of proposed regulations, do you see any forces at work that would significantly reduce availability of shale gas or significantly increase those costs? Of course, I know --

MR. SNIDER: I will caveat that in that I'm not our fuels expert, so I don't want to speak for him. But at this point, there is -- there's a debate in the industry. I have been reading a lot of the literature and looking through, you know, what others are saying about it. The forces

| 1 | working against it are future regulations that |
|----|---|
| 2 | might preclude shale gas. And everything I'm |
| 3 | reading it's less about precluding as what's the |
| 4 | cost to comply with those future regulations. So |
| 5 | it's the groundwater, the wastewater, cleanup that |
| 6 | would be required, the environmental regulations |
| 7 | around the horizontal drilling and the fracking |
| 8 | that's required to get the shale gas. So it's a |
| 9 | question of cost as opposed to availability, at |
| 10 | this point, and there's a wide range of estimates |
| 11 | as to that being very insignificant to some people |
| 12 | saying it could be significant cost. And again, |
| 13 | I'll caveat that with I could probably get you more |
| 14 | detail from our fuel supply folks. |
| 15 | COMMISSIONER WHITFIELD: Thank you. Got one |
| 16 | more question along the lines of the natural gas. |
| 17 | And it's in your IRP, on pages 13 and 16. What is |
| 18 | the cost of natural gas what costs are your |
| 19 | natural gas on your bus-bar curves, what are |
| 20 | they based on, on your IRP, on page 13 and 16? |
| 21 | MR. SNIDER: Right. And those costs I'll |
| 22 | go back to it. |
| 23 | [Reference: PowerPoint Slide 23] |
| 24 | That's why I said those are based on forward- |
| 25 | looking gas prices that are represented here in the |

| 1 | red solid line. So if I were to take those on |
|----|---|
| 2 | dollar per megawatt-hour and go back to an MMBTU, |
| 3 | divide by seven what I wanted to use in this |
| 4 | slide was exactly the numbers we used in the IRP, |
| 5 | and that was my point on prices have declined since |
| 6 | that spring, so they were based on those prices |
| 7 | that you're seeing on slide 23. |
| 8 | COMMISSIONER WHITFIELD: Okay, thank you. |
| 9 | That's all I have. |
| 10 | CHAIRMAN HOWARD: Commissioner Fleming. |
| 11 | COMMISSIONER FLEMING: I just wanted to say I |
| 12 | think this has just been a very informative |
| 13 | session, and I have thoroughly enjoyed the |
| 14 | interaction that we've had. And I think the other |
| 15 | Commissioners, too. I know we could go on for a |
| 16 | long time asking questions. I'd like to ask Mr. |
| 17 | Waters something about EISPC, but in the interest |
| 18 | of time, I won't. |
| 19 | But I just wanted all of you to know how much |
| 20 | I enjoyed it and how informative it has been. And |
| 21 | I'd like to continue this discussion |
| 22 | MR. SNIDER: Thank you, Commissioner Fleming. |
| 23 | COMMISSIONER FLEMING: in the future. |
| 24 | CHAIRMAN HOWARD: Commissioners? Any other |
| 25 | questions? |

| 1 | [No response] |
|----|---|
| 2 | Well, again, I echo Commissioner Fleming's |
| 3 | thought; it was a great session. Enjoyed both of |
| 4 | you. It was very informative and helped us very |
| 5 | much. I've only got one question before we depart, |
| 6 | and that question is, Stan, do you have on anything |
| 7 | Clemson so nobody is sitting by you? I mean, |
| 8 | you're over there by yourself. I'd say you've got |
| 9 | a Clemson logo on your back, or something. |
| 10 | [Laughter] |
| 11 | That's just my curiosity. I think you're a |
| 12 | great fellow. |
| 13 | COMMISSIONER FLEMING: And he did a great job |
| 14 | on that a panel with Ron Vince. I've heard a lot |
| 15 | of positive comments about Progress after that. |
| 16 | CHAIRMAN HOWARD: And I see you still have a |
| 17 | special guest with you, Mr. Anthony. |
| 18 | MR. ANTHONY: [Indicating.] |
| 19 | CHAIRMAN HOWARD: Glad to have you. With |
| 20 | that, meeting adjourned. Thank you, very much. |
| 21 | [WHEREUPON, at 12:55 p.m., the |
| 22 | proceedings in the above-entitled matter |
| 23 | were adjourned.] |
| 24 | |
| 25 | |

CERTIFICATE

I, Jo Elizabeth M. Wheat, CVR-CM-GNSC, do hereby certify that the foregoing is, to the best of my skill and ability, a true and correct transcript of all the proceedings had in an allowable ex parte briefing held in the above-captioned matter before the Public Service Commission of South Carolina.

Given under my hand, this the 4th day of December, 2011.

Jo Elizabeth M. Wheat, CVR-CM-GNSC

ATTEST:

Jocelyn G. Boyd,

CHIEF CLERK/ADMINISTRATOR